Guildford borough Submission
Local Plan: strategy and sites

Regulation 19 consultation representations
(ordered by respondent ID number)

December 2017

Document 5 of 10
Respondent ID numbers 11000129 to 15199777
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6. Respondent 15145377 2500
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

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

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure
enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCl).
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

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

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

I am simply amazed that Three Farm Meadows has been left in the Local Plan following the unanimous vote against Wisley Property Investments back in April of this year. It all stinks of foul play and I would be interested to see what the reasons are as the reasons given for the planning refusal are not able to be fixed.

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

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

Attached documents:

**Comment ID:** PSLPS16/3776  **Respondent:** 11000161 / Elizabeth Crooke  **Agent:**

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

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

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

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

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and is more than double the figure used in previous plans.

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

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

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

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

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

• I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

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

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

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The number of new houses proposed arises from a Strategic Housing Market Assessment (SHMA) generated by a consultant's mathematical model which is not revealed in the plan, nor apparently has it been revealed to Guildford Borough Council (GBC). The Office of National Statistics has acknowledged a mistake in the numbers used by the SHMA and have updated their predictions, yet these revised figures are not reflected in the GBC Local Plan. The original unsubstantiated SHMA target housing number has been further increased by GBC to give a population increase which is almost 70% higher than the official national estimates for population growth in the Borough. The scale of this increase has alarming results e.g. an increase of up to 35% in existing West Horsley households – greater than any other single area in the Borough.

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

I object to the development of over 2,000 houses at Ockham (former Wisley Airfield)

The impact on the Horsley villages of such a huge mixed housing, retail, commercial, traveller and schools development, under 2 miles away, would be enormous. The plan also includes extensive and inappropriate developments at Burnt Common (400 houses & commercial developments) and Gosden Hill Farm, Burpham (2000 houses & mixed use developments).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7501</th>
<th>Respondent: 11000289 / Nick Bomford</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to Station Parade being designated a “District Centre”</td>
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<td>This ‘designation’ results from a misreading of the nature of the facilities in the village centre and would target the area inappropriately for future urban developments.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Comment ID: PSLPP16/7500</td>
<td>Respondent: 11000289 / Nick Bomford</td>
<td>Agent:</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object because the infrastructure is already overloaded</td>
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<td>Local Schools are full. Medical facilities stretched. Drainage is inadequate, roads and car parks are overloaded with little or no scope for improvements. Large increases in the volume of traffic will cause an increase in nitrogen dioxide and particulates in the environment – already a cause for concern in this area.</td>
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<td>Comment ID: PSLPP16/7498</td>
<td>Respondent: 11000289 / Nick Bomford</td>
<td>Agent:</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td><strong>Re: Guildford Borough Council new Draft Local Plan (2016)</strong></td>
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<td>- I object to the proposal to remove the Horsleys from the Green Belt</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>I object to the extension of the boundaries of the Settlement areas of the Horsleys</strong></td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10).
4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc).
5. Any public transport providers such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will, therefore, be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum. The associated traffic increase from the RHS has not been taken into account. The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account.
8. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.
10. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
11. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”. Opportunity (3) should be common to all sites and is not unique to this site.
12. I object to the increased area of the site as this now abuts additional heritage assets, including Upton Farm and Bridge End House negating the setting of these buildings and the wider Ockham Conservation Area.
13. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
14. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16).
15. I object to the removal of additional 3.1 ha from the green belt without any justification.
16. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.
17. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.
18. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
19. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.
20. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
21. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.
22. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.
23. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.
24. I object to the extension of the plan period by 1 year as it has not been identified as a major change.
25. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
26. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.
27. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
28. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
29. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.
30. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

31. I object to the housing number and particularly the fact that the Council have not, as required, used any constraints such as the green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

32. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

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

Attached documents:

Comment ID: PSLPS16/2709  Respondent: 11000385 / Sheila Robins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

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

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

I OBJECT TO the late inclusion of site A43 Garlicks Arch. This has been slipped in at the very last moment without proper consultation. The added 400 houses will cause overcrowding of our schools and doctors surgery. Our Villages Medical Centre is already over subscribed and difficult to get doctors appointments. Another 800 minimum people would completely swamp this facility. The 7000 sq mtrs of industrial area would also increase the amount of Commercial Vehicles in the area using the local roads. We hardly need industrial buildings, as past developments have stood empty for years.

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

Attached documents:

Comment ID: PSLPS16/2710  Respondent: 11000385 / Sheila Robins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO site A43A the on and off ramp at Clandon/Burnt Common. This will cause complete chaos in the area, as all roads leading to the junction are country roads leading from Clandon, Ripley and Send. At present it only takes an incident at Wisley/Junction 10 of the M25 and our villages are swamped with traffic. This junction will make the whole situation worse as the local roads are so narrow and are unable to be widened to suit increased traffic flow. The Send Road only leads to similar narrow roads in Old Woking and Hoebridge areas, which are also unable to be widened.

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

Attached documents:

Comment ID: PSLPS16/2712  Respondent: 11000385 / Sheila Robins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

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

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

I OBJECT TO site A45 The Talbot. This is overdevelopment in a conservation area. Overdevelopment in Ripley will completely spoil the feel of a village which will then be lost forever.

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

Attached documents:

Comment ID: PSLPS16/2711  Respondent: 11000385 / Sheila Robins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

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

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

I OBJECT TO site A57 The Paddocks – 4 Traveller Pitches. [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]

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

Attached documents:

Comment ID: PSLPS16/7559  Respondent: 11000385 / Sheila Robins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

I OBJECT TO site A57 The Paddocks – 4 Traveller Pitches. [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it.]

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

Attached documents:

Comment ID: PSLPP16/16821  Respondent: 11000385 / Sheila Robins  Agent:

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

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

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

The proposed widening of the M25 will only increase the amount of vehicles being drawn to junction 10 on the A3. The proposed building developments will only worsen the current situation

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

Attached documents:

Comment ID: PSLPP16/5997  Respondent: 11000385 / Sheila Robins  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO all erosion of the Green Belt. Once we use this for building it will be lost forever. There are plenty of Brown Field sites to be built on first before using the Green Belt. The Green Belt is a buffer between Woking and Guildford

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

Attached documents:

Comment ID: PSLPP16/6002  Respondent: 11000385 / Sheila Robins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

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

I OBJECT TO any “in-setting” (i.e. removal) of any villages from the GREEN BELT

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

Attached documents:

Comment ID: PSLPP16/16817  Respondent: 11000385 / Sheila Robins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

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

I OBJECT TO all erosion of the Green Belt. Once we use this for building it will be lost forever. There are plenty of Brown Field sites to be built on first before using the Green Belt. The Green Belt is a buffer between Woking and Guildford

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

Attached documents:

Comment ID: PSLPP16/16819  Respondent: 11000385 / Sheila Robins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

I OBJECT TO any “in-setting” (i.e. removal) of any villages from the GREEN BELT

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

Attached documents:

Comment ID: PSLPP16/5999  Respondent: 11000385 / Sheila Robins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

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

I OBJECT TO the Local Plan as the development proposed is not sustainable

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

Attached documents:

Comment ID: PSLPP16/16818  Respondent: 11000385 / Sheila Robins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

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

I OBJECT TO the Local Plan as the development proposed is not sustainable (Policy S1)

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

Attached documents:

Comment ID: PSLPP16/6004  Respondent: 11000385 / Sheila Robins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

I OBJECT TO the disproportionate amount of development on the A3 between Burpham and the M25 at Wisley. With 2000 houses at Wisley Airfield, 2200 homes at Gosden Hill Farm and 400 houses at Garlick’s Farm Send. This will make an urban sprawl in this part of Surrey and will completely change the environment for all the residents and who live here as well as increased air pollution from all the additional vehicles. There is a lack of evidence for the alleged housing need numbers.

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

Attached documents:

Comment ID: PSLPP16/16820  Respondent: 11000385 / Sheila Robins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

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

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

I OBJECT TO the disproportionate amount of development on the A3 between Burpham and the M25 at Wisley. With 2000 houses at Wisley Airfield, 2200 homes at Gosden Hill Farm and 400 houses at Garlick’s Farm Send. This will make an urban sprawl in this part of Surrey and will completely change the environment for all the residents and who live here as well as increased air pollution from all the additional vehicles. There is a lack of evidence for the alleged housing need numbers.

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

Attached documents:

Comment ID: SQLP16/968  Respondent: 11000385 / Sheila Robins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO the last minute inclusion of new sites in the Local Plan with not enough time for a proper consultation period

The proposed widening of the M25 will only increase the amount of vehicles being drawn to junction 10 on the A3. The proposed building developments will only worsen the current situation

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

Attached documents:

Comment ID: SQLP16/1852  Respondent: 11000385 / Sheila Robins  Agent:

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

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

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

I OBJECT TO the last minute inclusion of new sites in the Local Plan with not enough time for a proper consultation period

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

Attached documents:

Comment ID: PSLPP16/3370  Respondent: 11000481 / Jan Benton  Agent:

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

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

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

I object to the 2016 Draft Local Plan due to the lack of essential infrastructure.

In particular I feel that the proposed housing developments at Wisley and Gosden Hill, Merrow should not go ahead until the present traffic problems around the area, particularly on the A3, have been addressed.

If a tunnel is an option then the plans for this must be made before any developments in the area take place.

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

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4415</th>
<th>Respondent: 11000577 / Madeleine Nicholls</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I wish to register my strong OBJECTION to the Horsley Local Plan.</td>
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<tr>
<td>Removal from green belt - there have been no defensible &quot;exceptional circumstances&quot; given! We therefore must STAY in green belt.</td>
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<td>The village does not have ANY spare capacity as far as I can see, we do not have the school places, the doctor places etc.</td>
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<tr>
<td>As a disabled member of the community, I object strongly to any added pressure on village parking etc.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>Attached documents:</td>
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<tr>
<th>Comment ID: PSLPA16/3947</th>
<th>Respondent: 11000609 / Annabel Lintott</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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<td>I am writing with regard to the proposed Guildford Local Plan 2016.</td>
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<td>Firstly I am totally opposed to East and West Horsley being removed from the Green Belt as there is no justification for this status to be changed and the Key evidence document ‘Guildford Borough Economic Strategy 2013-2031’ makes no case for siting large numbers of new homes in this area.</td>
<td></td>
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<tr>
<td>There are no exceptional circumstances for West Horsley’s Defined Settlement Area boundaries to be extended and the incredibly important Green Belt be developed - once it is gone it is gone and the whole purpose of the Green Belt is to prevent the disappearance of our hugely valuable countryside.</td>
<td></td>
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<tr>
<td>West Horsley village amenities would not cope with the increased influx of people using the one small village shop, no post office and a limited bus service, not to mention the increased volume of traffic. Nor would the amenities of East Horsley be able to cope with the limited shopping facilities, already crowded train service let alone the further proposals to build 2,000 houses at Wisley aerodrome which would likely also also use and rely upon both East and West Horsley’s facilities.</td>
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<td>The area attracts a lot of walkers and cyclists throughout the year as we are at the foot of the Surrey Hills and also have a great deal of historic buildings. It is well renowned for being a beautiful area which we have a duty to preserve, the</td>
<td></td>
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</table>
The proposed housing development would be totally out of character with the general character of the area and ruin it forever which is entirely unacceptable and unnecessary.

As previously mentioned the area could not sustain the proposed amount of new homes due to the lack of services, but equally as important the lack of drainage which is a real problem in the area at present (with flooding occurring in both summer and winter, often severe), not to mention the added need for more school places at the local school which is always at full capacity. The increased need for parking spaces would also make using the villages and parking for the Raleigh school incredibly difficult. The doctor’s surgery would also be impacted negatively, it is already difficult enough to get an appointment and sometimes impossible to park at the surgery due to large volumes of traffic.

To summarise, the area simply cannot cope with the amount of new homes provided with lack of services, parking spaces, insufficient school places, the extra burden on the doctors surgery and local hospital, inadequate drainage and is totally at odds with the character of the area in general. These are all very serious considerations which will severely impact the Horsleys but above all the Green Belt simply has to be protected.

I seriously question why the proposed sites are being considered when there is an existing and highly sustainable local town, namely Guilford, where there is a fully workable and tested infrastructure, undeveloped brown sites, the space to do so and it is NOT the Green Belt.

I trust my comments will be taken seriously and the due amount of consideration is used when making this crucial decision.

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

Attached documents:
<table>
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<tr>
<th>Comment ID: PSLPP16/12007</th>
<th>Respondent: 11000865 / Nicholas Clemens</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

POLICY H1: Homes for all

I support the general policy statements made in this policy, which are mostly repeating NPPF polices. Our main concerns, as set out previously, are primarily with the scale of new housing being proposed.

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

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

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

POLICY H2: Affordable Homes

I support the general principle that developers should be required to contribute part of their development profit towards the cost of social housing in the borough. However, this ‘one-size-fits-all’ policy is seriously flawed and likely to prove highly inefficient, if not unworkable, in the longer term.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12010</th>
<th>Respondent: 11000865 / Nicholas Clemens</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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</table>

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICIES I1, I2 & I3

These three policies cover Infrastructure & Delivery, Supporting the Department of Transport’s ‘Road Investment Strategy’ and Sustainable Transport. Whilst we support the general policy statements as presented in each case, it is the detailed infrastructure proposals for Guildford Borough which give us cause for concern.

I believe there are serious deficiencies and shortcomings in the infrastructure of Guildford Borough as it is today and that the aggressive housing policy as proposed by GBC in the Proposed Submission Local Plan will exacerbate this problem.

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

Attached documents:

Comment ID: PSLPP16/12008  Respondent: 11000865 / Nicholas Clemens  Agent:

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

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

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

POLICY P2: Green Belt

Local Plan Policy P2 states that: We will continue to protect the Metropolitan Green Belt. I fully and un-equivocally support this policy.

Unfortunately, despite such brave words, GBC appears to be in breach of this policy itself through the housing policies that it has set out in the Local Plan. The analysis included in the Appendix shows that around 65% of the developments proposed in the Proposed Submission Local Plan are to be built on land currently within the Metropolitan Green Belt. We consider this outcome to be outrageous.

Under NPPF rules, GBC is permitted to make allowance for factors which may constrain the delivery of new housing, such as the need to protect the Metropolitan Green Belt or the restrictions required to protect the Surrey Hills Area of Outstanding Natural Beauty (‘AONB’) which is offered protection under the NPPF comparable to that of a national park. Although these areas make up a large proportion of the land area of Guildford Borough, GBC makes no attempt to reduce its housing delivery in order to take account of such constraints. I find this approach inexplicable.

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

Attached documents:

Comment ID: PSLPP16/12005  Respondent: 11000865 / Nicholas Clemens  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy S2: Borough Wide Strategy

This policy sets out the objective of adding 13,860 new homes to Guildford Borough over the 2013-2033 period of the Proposed Submission Local Plan, equating to an annual build of 693 new homes per annum.

The enormous scale of this building programme, which represents a net increase of 25% in the housing stock of Guildford Borough, a remarkable rate of increase for a borough in the English Home Counties. It is even more remarkable when the official statisticians at the Office of National Statistics (“ONS”) are projecting a population increase of some 15% for Guildford Borough over this same period.

Some explanation for this mismatch may partly be found in the conclusion of the West Surrey Strategic Housing Market Assessment, (“SHMA”), which looks at how the annual housing target of 693 homes is comprised. It estimates that 517 homes per annum arise from ‘the demographic starting point’ – effectively what the official statisticians at the ONS and the Department of Communities and Local Government (“DCLG”) are predicting Guildford will require based upon their population and household forecasts. To this is added in the SHMA another 120 homes per annum in order to ‘support economic growth’, a further 31 homes per annum to ‘improve affordability’ and 25 homes due to ‘student growth’, all of which totals up to 693 homes per annum target.

Economic growth is already factored into the statistics produced by ONS and DCLG, so what GBC are proposing actually comes on top of the official household growth forecasts for the borough. Moreover, the GBC Affordable Housing Policy H2 is proposing that all development sites (other than the very smallest) will be required to have 40% of their homes offered as affordable housing, so why another 31 homes per annum is needed as affordable housing on top of this 40% ratio is quite incomprehensible.

Furthermore, DCLG research has concluded that there is on average a 97% correlation between population growth and household formation. Therefore, if GBC’s target of a 25% increase in housing stock were actually realised, the outcome will be that Guildford Borough would see its population rise by around 25% over this period. This means that the resultant population growth for Guildford Borough would be at a level 67% higher than the official forecasts.

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

Attached documents:

Comment ID: PSLPP16/12011   Respondent: 11000865 / Nicholas Clemens   Agent:

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

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

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

I am concerned that there is a lack of transparency in how the consultants have reached the housing need figures.

With the United Kingdom is now exiting the EU and this will have the effect of reducing immigration figures.

There seems to be a lack of insight into changing retail usage and the fall in the need for retail floor space that could be freed up for residential homes, government planning policy recognises this and has made change of use easier. This would reduce the need for building on greenbelt and make town centres more vibrant with a higher number of residents using the facilities available.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
However I OBJECT strongly to the scale of extra housing proposed in the Draft Plan because it is based on some fundamentally flawed criteria.

1. I OBJECT to the basis on which the housing requirements have been calculated. A consultancy, GL Hearn, produced the SHMA but have not disclosed to the Council or to anyone else details of the mathematical model on which their calculations have been made. This is not the right way to manage such a critical input to the local plan and as a consequence your predictions lack credibility.

2. I OBJECT to the final target housing number (based on a mathematical model which has not been disclosed) which is almost 70% higher than the official national estimates for population growth in the Borough.

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

I OBJECT to the proposed new settlement boundary in East and West Horsley. In particular I object to the proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Kingston Avenue up to a tree line running along the Parish Boundary at the western edge of Kingston Meadows. The result is to take all of Kingston Meadows out of the Green Belt and make it more vulnerable to future development. Kingston Meadows is the main public recreational space of East Horsley, comprising various sports facilities and playing fields.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/13890  Respondent: 11001249 / Lesley Milton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

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

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

I OBJECT to the proposal that Station Parade in East Horsley be designated as a Rural District Centre for reasons which are obscure but it is patently unsuitable for the type and scale of developments that designation allows.

The retail environment at Station Parade consists of 25 premises including a library, post office, chemist, 5 restaurant/cafes, butcher, baker and 2 mini supermarkets. The largest of these is approximately 170-200 sq. m. There is no room for expansion of retail premises nor for the provision of extra parking places.

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

Attached documents:

Comment ID: PSLPP16/13885  Respondent: 11001249 / Lesley Milton  Agent:

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

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

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

I agree that some extra housing is needed in the Horsleys and in the Guildford borough and that a better mix of properties is needed – we need more properties for first time buyers and more for those wishing to downsize.

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

Attached documents:

Comment ID: PSLPP16/13891  Respondent: 11001249 / Lesley Milton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
1. I OBJECT strongly to the proposal to remove the Horsleys (and other villages in the Borough) from the **Green Belt**. In paras 79 and 80 of the NPPF (National Planning Policy Framework - Mar 12) the Government places great importance on the Green Belts and in Para 83 states that once established they should only be altered in “exceptional circumstances” through the preparation or review of the Local Plan.

65% of new houses in the Borough are to be built on land that is currently in the Green Belt.

The Green Belt around the Horsleys serves all 5 of the purposes set out in para 80.

Para 84 states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

The draft plan does not identify the “exceptional circumstances” required to remove the Horsleys (and other villages) from the Green Belt nor the “very special circumstances” required to build on Green Belt land.

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

**Attached documents:**
The site behind Ockham Road North in East Horsley is partially a level 3 flood risk area, and local residents are well aware of how much standing water there is in their gardens after rain. Building on such land will only exacerbate the problem. Other areas of the Horsleys are also flooded when it rains because the drains are inadequate. Substantially more houses will exacerbate the problem but no attention has been paid to drainage in the local plan.

- Schools and medical facilities

Local schools and medical facilities are already at capacity.

No extra school places are planned in the Horsleys and the school places proposed at Wisley Airfield will not be planned until many years into the project. 2600 new houses could easily mean 2600 children looking for school place!

I trust the Council will review its Local Plan basing it on a model for projected population growth which is available for inspection and with more attention paid to the infrastructure constraints and to the use of brown field sites rather than destroy our precious Green Belt

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

**Comment ID:** PSLPP16/13886  **Respondent:** 11001249 / Lesley Milton  **Agent:**

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I OBJECT to the fact that this inflated final target housing number results in

- up to a 35% increase in the number of households in West Horsley.
- up to a 90% increase in housing stock taking into account the two Horsley villages, Ockham and the proposed development at Wisley airfield

The impact on the Horsley villages of such a huge mixed development would be enormous and the infrastructure cannot sustain this – see below.

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

**Comment ID:** SQLP16/1624  **Respondent:** 11001249 / Lesley Milton  **Agent:**
It is proposed to upgrade the current A3 junction at Burntcommon to a full 4-way junction. SCC traffic modelling anticipates increased use of Guileshall Lane, Hungry Hill Lane and Tithebarns Lane (all not suitable for increased traffic volume) for traffic accessing the A3 at Burntcommon in order to travel to Guildford and beyond.

The SCC report states that “consequently, it indicates that further thought may have to be given to managing traffic in this area as part of a transport assessment should the development be progressed”.

A local plan when proposing new housing on a substantial scale must surely plan for the implications of increased traffic both on the major roads such as the A3 and the minor village roads. The current draft local plan has not given such issues enough consideration.

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

Attached documents:

Comment ID: PSLPA16/960  Respondent: 11001505 / Greta Edwards  Agent:

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

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

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

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

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

Attached documents:

Comment ID: PSLPS16/1463  Respondent: 11001505 / Greta Edwards  Agent:

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPP16/3214 Respondent: 11001505 / Greta Edwards Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

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

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

9] I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10] I object to the continued inclusion of a site (the former Wisley Airfield - known as Three Farm Meadows - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

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

Attached documents:

Comment ID: PSLPP16/3211 Respondent: 11001505 / Greta Edwards Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

Continued…………………………………2/

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

Attached documents:

Comment ID: PSLPP16/3212  Respondent: 11001505 / Greta Edwards  Agent:

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPP16/3213  Respondent: 11001505 / Greta Edwards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

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

8] I object to the fact that air quality concerns have all but been ignored. Air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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

Attached documents:

Comment ID: PSLPP16/3209  Respondent: 11001505 / Greta Edwards  Agent:

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

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

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

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 houses

I object to the draft Local Plan for 10 fundamental reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban sprawl stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

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

Attached documents:

Comment ID: PSLPP16/3210  Respondent: 11001505 / Greta Edwards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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

Employment land – POLICY E1, E2

Contrary to national trends, too much potential development land within the town centre is being allocated for retail or commercial development rather than housing. High added value businesses are welcome in the borough, but much of the employment land is designated for retail or low added value employment floorspace, which only exacerbates current issues such as lack of low cost housing and heavy traffic. Sites such as the Burnt Common Triangle, currently in the Green Belt, are inappropriate for heavy industry,

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

Comment ID: pslp171/558  Respondent: 11001505 / Greta Edwards  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

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

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

Comment ID: pslp171/549  Respondent: 11001505 / Greta Edwards  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
**Use of land – density POLICY H13.**

The paragraphs relating to density in Policy H1 have been deleted. To ensure developments make optimal use of space there must be a policy to cover minimum and maximum densities. Without a policy to cover density, there is a risk that developers will use land inefficiently, putting additional pressure on the countryside and un-developed land. This deletion is inappropriate.

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

**Attached documents:**

<table>
<thead>
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<th>Comment ID: pslp171/553</th>
<th>Respondent: 11001505 / Greta Edwards</th>
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<td><strong>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P1</strong></td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

**AONB – POLICY P1 and POLICY E5**

The policy relating to AONB weakens the protections offered, and (unlike previously) does not have restrictions on non-major development. This is a move in the wrong direction. Previously all proposals were considered against the 5 key tests – now development in the AONB seems to be more acceptable. This is *weaker*, not stronger, and is contrary to huge responses from the public in previous consultations and the weight of protection given to AONB in the NPPF.

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

**Attached documents:**

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<th>Respondent: 11001505 / Greta Edwards</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

**Green Belt – POLICY P2 , POLICY P3, POLICY E5 and sites**

Exceptional circumstances must be demonstrated in order to develop Greenbelt yet despite the weight of public opinion against weakening of this policy, 70% of new housing development will be in the countryside, of which, 58% will be in Greenbelt. By definition, this is not an exception and no attempt is made to demonstrate exceptional circumstances, in line with the requirements of the NPPF. Insetting villages is of concern since restrictions within the settlement boundary raises concerns over loss of character.
The Rural Economic Strategy covered in 4.51a, promoting affordable homes everywhere in the countryside including the AONB as a main aim, is a mechanism for promoting overdevelopment in our countryside. It has not been subject to full public consultation and is based on data, which is not up-to-date.

Three major strategic sites – Blackwell Farm, the former Wisley Airfield [Three Farms Meadows] and Gosden Hill Farm – are in the Green Belt. Previous consultations show that, in line with the NPPF, the public would prefer to use brownfield land in the urban area first.

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

Attached documents:

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**Comment ID:** pslp171/548  **Respondent:** 11001505 / Greta Edwards  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

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

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

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**Housing number – POLICY S2**

The housing target proposed, of 12,426 is based on assumptions that have not been made public and includes flaws that have not been corrected in the modified SHMA (verified by professional analyst Neil MacDonald of NMSS who concluded that an annual housing figure of 400 per year would meet Guildford's overall need). The phased approach (more homes built towards the end of the plan period) is appropriate in order to permit necessary infrastructure but open-ended targets where an unknown figure is held back until after the plan period is not a reduction but a postponement and does not allow for optimal planning or transparency.

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

Attached documents:

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**Comment ID:** PSLPA16/4397  **Respondent:** 11001761 / Brandon Sievering  **Agent:**

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Send village being removed from the Green Belt. The green belt was intended to be permanent, and there are no special circumstances to justify abandoning it. Send's Green Belt provides an essential buffer stopping Woking and Guildford becoming one conurbation. Local councillors and central government gave a clear election promise to protect the Green Belt and this reneges on it. Developers will be quick to take advantage and there will be nothing to stop them. It is not needed - redevelop in existing urban areas and 'build up' instead.

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

Attached documents:

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Comment ID: PSLPS16/8057  Respondent: 11001761 / Brandon Sievering  Agent:

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

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

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

---

I OBJECT to building 45 houses at Clockbarn Nursery due to inadequate access and traffic volumes. Tannery Lane is far too narrow and twisty to take any more traffic. The junction with Send Road is already very hazardous for vehicles trying to join the main road, there have been a number of accidents. Planning permission has previously been given for 64 apartments at the Tannery and for building the Marina, both of which will generate additional heavy traffic. The lane cannot take any more.

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

Attached documents:

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Comment ID: PSLPS16/8056  Respondent: 11001761 / Brandon Sievering  Agent:

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

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

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

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I OBJECT to building 400 houses and 7000 sq meters of industrial space at Garlick's Arch, opposite Send Marsh Road. This will create unsustainable amounts of traffic on the already extremely busy Send Marsh Road and Portsmouth Road. The queue of traffic is often down as far as the Saddlers Arms pub. It will become impossible to get onto Portsmouth Road with any additional houses or industrial space.

Some of the new development is intended to be "affordable" housing. Surely it makes more sense to build these closer to the areas, and public services, where jobs are based, i.e. Guildford itself, to prevent increased volumes of commuters down the A3? Why doesn't Guildford Borough Council consider building 'upwards', on existing or redeveloped sites, instead of destroying woodland in the Green Belt?
In addition, building on this site increases the risk of flood, in an area already prone to flooding.

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

Attached documents:

Comment ID: PSLPS16/8059  Respondent: 11001761 / Brandon Sievering  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

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

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

I OBJECT to a new interchange with the A3 at Burnt Common because Send would have to take traffic from the proposed 2000 new houses at Wisley Airfield, 2000 houses at Gosden Hill, Burpham and 1850 at Blackwell Farm. Much of this traffic to and from the A3, M25, Woking and Guildford would go through Send. Send Road, which is already overloaded, would become gridlocked. Noise and pollution levels, already at excessive levels, would worsen.

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

Attached documents:

Comment ID: PSLPS16/8058  Respondent: 11001761 / Brandon Sievering  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

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

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

I OBJECT to the development of 40 houses and 2 travellers' pitches at Send Hill. It is an inappropriate location because the narrow width single access country road provides insufficient access. The subsoil of the proposed site contains documented unsafe landfill waste registered at GBC. Any development there would spoil a high amenity area set in beautiful countryside.

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

Attached documents:

Comment ID: PSLPP16/17892  Respondent: 11001761 / Brandon Sievering  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Page 32 of 2855
As a current Send/Ripley resident, I wish to inform you of my objections to the 2016 Draft Local Plan:

I would like to object to the proposed new Send and Ripley developments. I appreciate some additional housing, in particular "affordable" housing, will be required in future. However, I do not believe destroying Guildford's beautiful and protected Green Belt is the way to do this.

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

Attached documents:

Comment ID: PSLPP16/17893  Respondent: 11001761 / Brandon Sievering  Agent:

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

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

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

There is already a strain on public services and infrastructure in Send/Ripley. It can be difficult to get a GP/NHS dentist appointment, and the roads are typically poor condition and heavily congested. As a commuter the Send Marsh Rd/Portsmouth Rd junction already gets particularly congested, as does the Send Marsh Rd/A247 junction. The A3 to M25 Wisley interchange is a nightmare, and would not be able to deal with additional traffic (plans suggest some widening of this junction but nothing has been planned yet?). With further developments I would likely have to move elsewhere as my commute would be unbearable.

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

Attached documents:

Comment ID: pslp171/2557  Respondent: 11001793 / Claire Brown  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
No case has been made for “Exceptional circumstances” for building on the greenbelt, even though Guildford Borough council have rejected plans for the Wisley Airfield, this has been included again.

I object to the continued proposed ‘insetting’ of East & West Horsley and other villages from the Green Belt and the expansion of the settlement boundaries.

I object to the statement in P2 (4.3.13) that these villages are ‘now inset from the Green Belt’ when this is only a proposal. I also object that this section does not take into account an assessment of there Green Belt benefits.

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

Attached documents:

Comment ID: PSLPA16/4556  Respondent: 11002881 / Sheila Proctor  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

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

We strongly support the need for improvement in the infrastructure of East and West Horsley. However, the GBPSLP is focused on the Infrastructure required to support potential future development. This ignores the fact that the current infrastructure is not functioning in an acceptable manner.

The Infrastructure in the Horsleys is not only failing to meet the current needs of users but some aspects, such as roads, have no obvious possibility for improvement. The boundaries of the B2039, which runs through East Horsley, are such that widening is not possible. The number, vehicle size and speed of the current traffic using this road is already far greater than the original design could have envisaged. The inability of the roads, drainage, schools and medical facilities to adequately support the existing homes within East and West Horsley is evident, and has been acknowledged at Borough and County level. We do not believe that Community Infrastructure Levy is intended or designed to deal with these existing constraints. **We therefore object** to the development proposals in the Horsleys on the grounds that infrastructure constraints have not been applied, and no data has been produced to demonstrate how the existing issues can be dealt with.

In addition, the impact of the proposed 2,000 houses at Ockham on the site of the former Wisley airfield would have a dramatic affect on the roads, station parking and rail transport overloading for residents of East and West Horsley. It would also create a settlement of questionable sustainability besides removing an environmentally sensitive and strategically placed tract of land from the Green Belt. **We therefore object** to the identification of this as a strategic development site and request its removal from the plan.

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

Attached documents:

Comment ID: PSLPP16/15253  Respondent: 11002881 / Sheila Proctor  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E8
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

We previously commented on your designation of East Horsley as a Rural District Centre in the draft Local Plan. We note that the designation has now changed to a District Centre and we repeat our objection to this on the grounds that the designation completely misreads the situation. The direction of main town centre uses towards the village, as a District Centre, would not only be inappropriate and unsustainable, but would be physically impossible to introduce. It should also be noted that there is already insufficient parking in the village for those using the local amenities, and there is no available space to alleviate this. The error in designating East Horsley as a District Centre is compounded by the fact that Cobham, which is in close proximity but outside the GBC boundary, is in reality the District Centre for the Horsleys and vicinity. The reason for this is the much more extensive range of services available, including two large supermarkets and branches of 4 different banks, compared to the Horsleys where there is no large supermarket and only one bank.

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

Attached documents:

Comment ID: PSLPP16/6354  Respondent: 11002881 / Sheila Proctor  Agent:

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

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

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

Similarly, the proposal to change the boundaries of the current settlements of East and West Horsley does not appear to have been tested on the ground and appears solely aimed at releasing land for development. The arguments for changing specific boundaries are in some cases contradictory, and in some cases fail to meet the test of identifying more sustainable boundaries than those currently defined. I therefore object to the proposal to change the boundaries of the settlements.

In addition I would observe that the existing infrastructure in the East and West Horsley area - in particular the roads and drainage - are not functioning in an acceptable manner at the present (viz. crowded, potholed and flooded under even mild rain conditions) and the prospect of the addition of the potential number of houses in the villages and the proximate addition of 2,000 at Ockham, 400 at Burnt Common and 2,000 at Gosden Hill Farm needs to be severely tested by the application of infrastructure constraints and I object to the strategic site proposals indicated and to the larger land areas within the villages.

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

Attached documents:

Comment ID: PSLPP16/6352  Respondent: 11002881 / Sheila Proctor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
I object to the proposal to inset the villages of East and West Horsley from the Green Belt. Nowhere in your documents do you produce evidence to support the existence of exceptional circumstances which would support this being carried out. All the objective evidence seems to derive from the need to release land for building development, and the study carried out by your consultant is inconclusive, subjective, and fails to take adequate note of the fact that the original aims of the Green Belt are still met in the cases of villages like East and West Horsley. The report of the study by your consultant bears the hallmarks of a desktop study and the result is a shallow analysis of the current situation which lacks conviction.

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

Attached documents:

This policy states that Guildford Borough Council (GBC) will continue to protect the Green Belt and we fully support that aim.

In the villages of East and West Horsley the original objectives of the Green Belt continue to be fully met and we disagree with the analysis in the Green Belt and Countryside Study (GBCS) documentation produced by consultants on behalf of GBC which fails to acknowledge the open nature of the villages, the large areas of woodland and open space which are integral to the appearance of the area and the low density of housing in the settlement areas.

We object strongly to the proposal to remove the villages from their current status by insetting them from the Green Belt and we do not believe that GBC have demonstrated the exceptional circumstances which are necessary to support such a proposal. The only circumstances that they present are those for increased development, in particular housing, which is unacceptable as a basis even if the proposed development was based on accurate and supportable evidence. As outlined above, this is not the case as the OAN and the SHMA are flawed.

There is also a proposal to change the settlement boundaries for the villages which appears to arise from the GBCS. The reason for changing the boundaries appears to be solely in order to include additional area inside the village boundaries in order to make land available for development. In many of the cases the proposed extended boundary lines are less recognisable in logic and certainly less defensible than the existing ones. We object to these proposals to change the settlement boundaries for East and West Horsley and in addition object to the newly designated "identified boundary for the Village" proposed to the south of the A246 in the area of Chalk Lane, The Warren, Rowbarns Way and Green Dene.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Comment ID:** PSLP16/6356  **Respondent:** 11002881 / Sheila Proctor  **Agent:**

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

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

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

I have read a number of analyses of the numbers which you derived for the Objectively Assessed Housing Need (OAN) and the SHMA and am persuaded that the built up numbers which you have taken as the basis for deriving the development policy, are unsound. I therefore object to Policy S2.

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

**Attached documents:**

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**Comment ID:** PSLP16/15251  **Respondent:** 11002881 / Sheila Proctor  **Agent:**

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

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

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

We consider that the Housing Targets on which the policy is based are derived from an Objectively Assessed Housing Need (OAN) and a Strategic Housing Market Assessment (SHMA) which are flawed. The modelling to produce the original number has not been demonstrated to adequately represent either the historic immigration figures nor the projected figures issued by the Office of National Statistics (ONS). The further increases made to the demographic starting point are in some cases inappropriate and in some case erroneous. Given that the proposed developmental needs in the borough are based on what we consider to be inaccurate data we object to Policy S2.

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

**Attached documents:**

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**Comment ID:** PSLPA16/3414  **Respondent:** 11002945 / David Guthrie  **Agent:**

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

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

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

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

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

Attached documents:

Comment ID: PSLPS16/6633  Respondent: 11002945 / David Guthrie  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

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

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

I object to building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.

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

Attached documents:

Comment ID: PSLPS16/6634  Respondent: 11002945 / David Guthrie  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

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

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

I object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the (A247) would be gridlocked all day. This would just provide an alternative route for people

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

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

1. I object to the proposal in the local plan on the grounds that the site is not large enough for the proposed use.
2. I object to the proposal in the local plan on the grounds that it would cause adverse impact on street parking.
3. I object to the proposal in the local plan on the grounds that Send Hill is a single track country road and too narrow to provide sufficient access to the site or accommodate the potential new levels of traffic the proposed development would bring.
4. I object to the proposal in the local plan on the grounds that Send is in green belt. The proposed inset is inappropriate due to its permanent green belt status.
5. I object to the proposal in the local plan on the grounds that Send Hill is a narrow road result in loss of a turning and passing point for vehicles.
6. I object to the proposal in the local plan on the grounds that it would impact the nature reserve nearby. The proposed site is a quality green belt amenity area within countryside and would be spoilt by development.
7. I object to the proposal in the local plan on the grounds that the existing road and parking infrastructure is already inadequate or under pressure and could worsen with the planned development, reducing quality of life.
8. I object to the proposal in the local plan on the grounds that too many houses are proposed to Send/ Send Marsh are and the impact on traffic congestion and local services would be unacceptable.
9. I object to the proposal in the local plan on the grounds that the proposed number of houses potentially could result in 92 extra cars in Send Hill which is already suffering from congestion particularly at school run time.
10. I object to the proposal in the local plan on the grounds that this would cause loss of village identity, be detrimental to the community and increased flood risk.
11. I object to the proposal in the local plan on the grounds that a Wasteland Solutions environmental report on Send Hill dated March 2004 gave evidence of past ponding of water in the excavated area. Further development would disturb water table and increase risk of flooding to my property.
12. I object to the proposal in the local plan on the grounds that the proposed development site (A44) was used as GBC registered landfill site, not a quarry as listed as reference LLA 2081 in the local plan.
13. I object to the proposal in the local plan on the grounds that the 1963-8 Ordnance Survey maps of proposed site mark it as “refuse and slag heap”. It is therefore unsuitable for such a development on health reasons.
14. I object to the proposal in the local plan on the grounds that the 1971 Ordnance Survey maps of proposed site mark it as “refuse tip” prior to when proper licensing/registration was required. The date of the landfill works predates the 1999 EU Landfill Directive regulations. I therefore believe that there is a danger that any disturbance would be health hazard due to the unknown materials.
15. GBC has installed gas monitoring wells on site since July 2000. One well recording methane gas discharge.
16. I object to the proposal in the local plan on the grounds that a Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005-Identifies the proposed site as GBC recorded landfill site Ref GU/12 with type of waste identified as “unrestricted”. This causes me concern as to what it does contain and dangers if disturbed.
17. I object to the proposal in the local plan on the grounds that both the Envirosearch Report RS1100201_1_1 dated 17th February 2004 and historical map data and information from GBC has identified site as landfill and has
“areas of potentially contaminative industrial activities”. Development of this site would be a health hazard. The recent news reports of a child dying from seepage of contaminated ground following flooding prove that developing any such sites is a danger to health. The Daily Mail has also recently had an article on how the dangers of living near landfill site raises cancer concerns. The paper referenced a study published by the International Journal of Epidemiology which tracked 242,000 people living near landfill sites in Italy.

19. I object to the proposal in the local plan on the grounds that both the Envirosearch Report RS1100201_1_1 dated 17th February 2004 identifies “potential risk from landfill gas migrations” which I believe is a health hazard.

20. I object to the proposal in the local plan on the grounds that both Envirosearch Report RS1100201_1_1 dated 17th February 2004 concludes “potentially contaminative industrial sites identified from analysis” of Ordnance survey maps.

21. I object to the proposal in the local plan on the grounds that the Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005 identifies proposed site as a local authorised landfill site as licences under Part II of Environmental protection Act 1990. The proposed site is not a quarry as specified in the GBC Local Plan. And is therefore not suitable for the proposed usage.

22. I object to the proposal in the local plan on the grounds that the Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005 identifies proposed site as potentially contaminative industrial land. With usage of “Heap and unknown constituents”. This causes me concern as to what it does contain and dangers if disturbed.

23. I object to the proposal in the local plan on the grounds that the Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005 identifies changes to proposed site could cause potential ground water vulnerability to my property.

24. I object to the proposal in the local plan on the grounds that the Traveller Accommodation Assessment research, purported to have been undertaken in June-July 2012 by Mill Field Services, cannot be so. The Sittingbourne based market research company was dissolved in January 2011 according the government companies’ site.

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

Attached documents:

Comment ID: PSLPP16/13906  Respondent: 11002945 / David Guthrie  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

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

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

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

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

Attached documents:

Comment ID: PSLPP16/13899  Respondent: 11002945 / David Guthrie  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

1. I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford while providing a life enriching environment for my family.

2. I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances. If we start making exceptions the boundaries to stop this happening in the future are removed. The Green Belt is meant to be permanent and not continually eroded.

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

Attached documents:

Comment ID: PSLPP16/13902  Respondent: 11002945 / David Guthrie  Agent:

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

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

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

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

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

Attached documents:

Comment ID: PSLPP16/13907  Respondent: 11002945 / David Guthrie  Agent:

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

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

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

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

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.”1 Standing at the head of the draft plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

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

I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.

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

I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.
<table>
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<th>Comment ID: PSLPA16/2765</th>
<th>Respondent: 11003297 / Daniel Fuller</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley</td>
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<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( )</strong>, is Sound? ( ), is Legally Compliant? ( )</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ( )</strong></td>
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</table>

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

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

**Attached documents:**

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<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/1130</th>
<th>Respondent: 11003361 / Howard Milner</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ( )</strong></td>
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</table>

I am shocked to hear that there is another push to build more housing in the Horsley's.

If I recall correctly, that idea was rejected. The Horsley area simply does not have the infrastructure to support an enlarged local population. Water, Sewage, Education, Transport would all need to be enlarged to make a plan such as the proposed one work.

so you would have to perform extensive road works and renovations, increase the parking capacity of the train station to cater for the new residents that will work in London or Guildford, build at least 1 new primary and secondary school to ensure that the children of the parents get their right to education.

also, the Horsley's are beautiful. and building here will take away that beauty.

instead of building horizontally, you build vertically? several blocks of nice flats would probably suffice, if not then build away from the Horsley's. the residents of this area have told you once and I'm fairly certain that we will tell you again

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

**Attached documents:**
I object to the fact that local villages are to be obliterated in an effort to bring money into GBC so that they can fund their
vanity project of a tunnelled A3 to Bypass Guildford.

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

Attached documents:

Comment ID: PSLPS16/2030  Respondent: 11003361 / Howard Milner  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

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

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

I object to the proposed development at Garlick’s Arch, Burnt Common, Policy A43

This is partly ancient woodland, and the proposal to develop it with a mix of industrial warehousing and residential
properties would undoubtedly lead to the loss or damage to these ancient trees, plus the resultant run off of rainwater would
increase the likelihood of flooding to properties including my own further downstream, it would appear that no
consultation with the environment agency who recently invested in flood defences along our stretch of the East Clandon
Stream has taken place.

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

Attached documents:

Comment ID: PSLPS16/2031  Respondent: 11003361 / Howard Milner  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposed 4 way interchange from the A3 at Burnt Common. Policy A43

The proposal that an interchange at this part of the A3 shows no thought what so ever, how is it considered prudent to take traffic from a fast moving 3 lane “A” road and push them onto roads that are little more than country lanes, at a recent meeting GBC officers when asked about the creation of bottle necks at local points of congestion answered that they would have to “consult with other local authorities”, proving the point that no thought had been given to their plan.

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

Attached documents:

Comment ID: PSLPP16/4312  Respondent: 11003361 / Howard Milner  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

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

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

I object to the complete lack of provision of services for this proposed increase in population, Medical facilities, Schooling and local transport.

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

Attached documents:

Comment ID: PSLPP16/4310  Respondent: 11003361 / Howard Milner  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

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

I request that the following comments are shown the Planning Inspector.

I wish to register my strongest opposition to GBC proposal to desecrate the Green Belt.

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

Attached documents:

Comment ID: PSLPP16/4311  Respondent: 11003361 / Howard Milner  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

I object to any planned Green Belt erosion.

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

Attached documents:

Comment ID: PSLPP16/4313  Respondent: 11003361 / Howard Milner  Agent:

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

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

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

I object to the fact that local villages are to be obliterated in an effort to bring money into GBC so that they can fund their vanity project of a tunnelled A3 to Bypass Guildford.

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

Attached documents:

Comment ID: SQLP16/781  Respondent: 11003361 / Howard Milner  Agent:

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

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

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

Whilst the need for homes can be appreciated it seems more than a little perverse not to firstly develop Brown Field sites for both industry and residential uses, especially in the light of dubious figures being used to substantiate this need for development.

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

Attached documents:
Comment ID: SQLP16/782  Respondent: 11003361 / Howard Milner  Agent:

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

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

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

I object to the very limited consultation period
I object to the late inclusion of new sites.

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

Attached documents:

Comment ID: pslp172/1338  Respondent: 11003361 / Howard Milner  Agent:

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

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

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

I object to your Policy A42,
The increase in proposed density totally ignores all previous objections, takes no account of the traffic problems that this development will create in Send village and surrounding “country” roads, it also will put greater pressure on local medical facilities and schools.

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

Attached documents:

Comment ID: pslp172/1339  Respondent: 11003361 / Howard Milner  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to your Policy A43,

Again you have ignored all previous objections and offered no alternative plans to alleviate the concerns of local residents.

No demand for Travelling Showpeople has ever been shown or proven to exist.

The government is at this time reviewing in a White Paper its housing policy to protect “Aged or Veteran Trees and Ancient Woodland” yet you are proposing to build over them!

The land is in a flood zone 2 category area and any development will undoubtedly increase runoff into the East Clandon Stream which has in the past flooded local properties and is at this time being re surveyed by the Environment Agency.

This proposed development will also increase pressures on local roads, Schools and Medical facilities.

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

Attached documents:

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I object to your Policy A58,

I am unable to understand your desire to build Industrial and warehousing units on Green Belt land whilst empty units exist in both Guildford and at Slyfield.

The congestion that a development on this scale will create in this area is unimaginable, not only the employees on such a site having to drive to work as inadequate public transport exists, but the mayhem that will be created by large commercial vehicles trying to navigate the local “Country Roads” to gain access to the site.

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

Attached documents:

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The congestion that a development on this scale will create in this area is unimaginable, not only the employees on such a site having to drive to work as inadequate public transport exists, but the mayhem that will be created by large commercial vehicles trying to navigate the local “Country Roads” to gain access to the site.

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

Attached documents:
I object to your Policy 2, at paragraph 4.3.15

On what grounds do you find it acceptable to remove an old existing “non-conforming” business out of Green Belt jurisdiction?

Yet again you have made no consideration of the Traffic problems that further development of the area would create in the Village and surrounding Lanes, I use the term lanes because they could only just about be classed as roads.

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

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPA16/706</th>
<th>Respondent: 11003681 / Elizabeth Milner</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I object to the lack of immediate provision for new schools

I object to the lack of any immediate provision for Doctors Surgeries

It was mentioned at a recent Send planning meeting that no building would be started until the new road infrastructure was in place which was due to start in 2020. Then it was said that the building would start in 2017. Nobody is using joined up thinking.

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

Attached documents:

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<th>Comment ID: PSLPA16/705</th>
<th>Respondent: 11003681 / Elizabeth Milner</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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</table>

I object to the lack of evidence for the alleged housing need numbers

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

Attached documents:
I would like to register my strong objections to the 2016 Draft Local Plan.

The NPPF prevents the merging of settlements without any exceptions. There are no exceptional circumstances. Why has this been proposed?

I object to the proposed development of land at Garlick’s Arch Burnt Common. Policy A43/A43a. There are ancient woodlands at Garlick’s Arch and this area should be conserved, there are trees dating back to the 16th century which could be felled or damaged. Also adding 400 homes and 7000 sq m of various types of employment space as well as new 4 way junction for the A3 would cause significant stress on local services and roads, which are already unable to cope. This site presents a significant change from the Regulation 18 consultation in 2014. Where is the infrastructure??

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

Attached documents:
**Comment ID:** PSLPP16/2155  **Respondent:** 11003681 / Elizabeth Milner  **Agent:**

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

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

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

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I object to all Green Belt erosion

Under this policy Send will be inset from the Green Belt which means that all areas within the settlement boundary will no longer be afforded Green Belt protection. There are plenty of sites that could be utilised. Wisley Airfield for one.

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

Attached documents:

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**Comment ID:** SQLP16/423  **Respondent:** 11003681 / Elizabeth Milner  **Agent:**

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

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

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

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I object to the disproportionate amount of development in one area of the borough

Why has industrial and warehouse space been proposed? There is room at Slyfield and this site should be fully developed to prevent proliferation of industrial areas in the Surrey Countryside. The logical thing would be keep them all on one site. The proposed industrial development of 7000 sq m is simply not required since the latest Employment Land Need Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. A new 4-way interchange onto the A3 at Burnt Common to serve this development would be disastrous for Send, Ripley 7 Clandon. Send Road (A247, would be gridlocked all day. Send would be the through route to Woking for traffic leaving the M25 & A3. Send cannot cope.

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

Attached documents:
I object to the limited consultation period

I object to the last minute inclusion of new sites with less than 2 weeks notice

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

Attached documents:

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Comment ID:  pslp172/1335  Respondent:  11003681 / Elizabeth Milner  Agent:

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

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

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

I object to Policy A43 –Land at Garlick’s Arch, Send Marsh

Travelling Show People plots in this location? There is no demand. The number of homes is too great and will cause over-development of our village. Our wonderful, beautiful ancient woodland that existed at the time of Elizabeth I cannot not be chopped down. The government is at this moment reviewing the protection of ancient woodland and greenbelt. Send and Send Marsh are already subject to flooding frequently and is currently a flood zone 2 allocation. Lead shot has accumulated over fifty years so parts of the area is contaminated. Send and Ripley and local areas are already too congested with traffic this proposed development will just exacerbate the problem. The traffic noise is already at an unbearable level.

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

Attached documents:

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Comment ID:  pslp172/1336  Respondent:  11003681 / Elizabeth Milner  Agent:

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

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

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

I object to Policy A58 - Land at Burn Common, London Road

Why is there a need to build industrial / warehousing in the middle of the green belt when Slyfield and Guildford have empty sites and industrial units. The 2017 Employment Land Need Assessment shows a reduction in demand. Gridlock will occur on the small roads around this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: pslp171/314  Respondent: 11003681 / Elizabeth Milner  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

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

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

Green Belt Policy 2 at paragraph 4.3.15

I object to the proposal to inset Send Business Park from the Green Belt because

There is highly restricted vehicle access along Tannery Lane in both directions

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

Attached documents:

Comment ID: PSLPS16/4280  Respondent: 11003905 / Helen Chamberlain  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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

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

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:
• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
• I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   1. The assertion that the development will result in a meaningful shift to cycling, walking and horse riders. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them) And to horse riders who use the local narrow lanes to access bridle paths in the area.
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
• I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.
• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.
Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

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

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

Attached documents:

Comment ID: PSLPA16/1434  
Respondent: 11003969 / David Pycraft  
Agent: 

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

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

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

I am writing to you to object to the Local Plan for development in and around Send, Send Marsh, and Ripley.

I object to the development at Garlick's Arch for 400 houses and 7000 square metres of industrial space. The infrastructure of Send Marsh and Send cannot cope with such a surge in the local population, most notably, the strain on The Villages surgery, and also the two schools - in Send and Ripley First School. The roads would also be unable to cope with the additional traffic from both the additional houses and the proposed industrial site, as traffic in the area from the M25 and A3 already leads to severe congestion throughout the day (e.g. the rush hour commuter route of traffic cutting through Send to and from Woking via the A3; also, the mid afternoon school run for Send's two schools). It is also the case that the industrial site is not required, as the Employment Land Needs Assessment 2015 (ELNA) shows an 80% reduction in required employment floor space from the previous draft plan.

I object to the 4-way A3 junction at Burnt Common, on the same grounds as above; that is, that Send simply cannot cope with the additional traffic it would bring. Not only would there be increased risk of gridlock, but also of accidents. Of course, the danger to both drivers and pedestrians is of the highest priority, but also, an accident on the narrow road in Send would lead to miles of gridlock.

I object to the proposed 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm, as these will also add to the already severe traffic congestion in the area, with traffic heading through Send and Send Marsh via the A3, often so as to access the M25 via Junction 10.

I object to Send being removed from the Green Belt (Policy P2). The National Planning Policy Framework (Point 80) states that one of the reasons for the Green Belt land is 'to prevent neighbouring towns merging into one another'. Send and Send Marsh clearly fulfil this role, as they prevent the merging of Guildford and Woking into one large urban sprawl.

I object to the proposal to build 45 houses at Clockbam Nursery, on Tannery Lane. This area floods regularly. Furthermore, there is only a very narrow, single track, winding road, where vehicles often have to reverse in order to let oncoming traffic pass. There is simply not the infrastructure to accommodate any more houses on this site. Moreover, just as Send and Send Marsh act as a buffer between Guildford and Woking, so this particular area acts as a buffer between Send and Send Marsh.

I object to Policy A44 . 1.9 ha, which is the proposed development of 40 houses and 2 traveller's pitches at Send Hill. The road already experiences heavy traffic, and could not cope with the additional amount of traffic expected. I also object on the grounds of the feared impact of the nearby nature reserve. I also object to the proposal in the local plan on the grounds...
that the Envirossearch Report RS1100201_1_1 (dated 17th February 2004) identified that there is "potential risk from landfill gas migrations", which presents a health hazard.

I object to the Local Plan on the grounds of Guildford Borough Council (GBC) having greatly increased the number of proposed houses since April 2016. This significant change in the proposal therefore requires another full consultation under Regulation 18, and not of Regulation 19 which GBC are trying to utilise in order to rush the process through.

This is a beautiful area of Surrey, which is preserved as part of the Green Belt. Even without this consideration, I trust that you will see that Local Plan, with its potential for severe and dangerous strain on local services and infrastructure, is wholly impractical, and will destroy the area and the quality of life of its residents. It is with great concern that I demand that the proposed developments be abandoned.

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

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPA16/1435</th>
<th>Respondent:</th>
<th>11003969 / David Pycraft</th>
<th>Agent:</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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I am writing to you to protest about the plans for building on Green Belt sites in and around Send and Send Marsh.

I object to Send being removed from the Green Belt (Policy P2). The National Planning Policy Framework (point 80) states that one of the purposes of Green Belt land is ‘to prevent neighbouring towns merging into one another’. Send village and its surrounding Green Belt land acts as the necessary buffer between Guildford and Woking.

I object to the building of 45 houses at Clockbarn Nursery. Planning permission has already been given for 64 houses in Tannery Lane, an area already unsuited to further development, due to both its frequent flooding and the narrow and winding lane. The lane simply cannot take the traffic an additional 45 houses would bring.

I object to the proposals for the development of 40 houses and 2 traveller's pitches at Send Hill (Policy A44.1.9 ha). The single track road would not be able to take the additional traffic, leading to potential gridlock. Send already suffers near gridlock in the mornings and especially in the evenings as vehicles travel through the village from the A3 to Woking and vice versa. This is also the case during the morning and afternoon school runs, with two schools in Send. This also raises the concern of safety for pupils and parents at these times.

I object to the proposed new interchange onto the A3 at Burnt Common for the same reasons as above; namely due to Send and Send Marsh not being able to cope with the additional traffic.

I object to the development at Garlick's Arch for 400 houses and 7000 square metres of industrial space. This area is prone to flooding. It also has ancient woodland, just the kind of specific area the Green Belt was established to protect. The industrial space is also unnecessary, based on the current Employment Land Needs Assessment 2015 (ELNA). This shows a reduction of 80% in required employment floor space from the previous draft plan.

I also understand that Slyfield actually has a large area which would be much more suited.
I object to the Plan due to the fact that the infrastructure of Send and Send Marsh simply cannot cope with the increased traffic and also the strain on local services such as the schools and the surgery. I urge you to abandon the Plan forthwith.

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

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/16409</th>
<th>Respondent: 11004129 / Alastair Reid</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

DRAINS, WATER SUPPLY, FLOOD RISK, CONGESTION

Our drains, our water supply, our medical facilities, car parks and our roads just cannot cope with the proposed number of new homes. Building this number of homes will lead to flood risk here and downstream (along the Wey and Thames). The planned development on Green Belt is therefore unsustainable.

As a commuter I know that the car parks at both Effingham Junction and Horsley stations are full every working day. Believe you me I have seen the congestion that exists. Additional houses mean more cars which just won’t be able to be accommodated at either station. It can be estimated that even if 25% of these new households use the stations to commute to London then we are talking about accommodating 675 extra cars at either Horsley or Effingham station. Does Guildford Council have an answer to car parking on this scale? Of course not.

As an East Horsley resident I am opposed to the removal of the Horsleys from the Green Belt along with consideration of Three Farms Meadows (the former Wisley Airfield) for a new town of 2,100 homes for the following reasons:

1. West Horsley. The number of new homes will swamp the village and change its nature irrevocably. I am not opposed to the development of the Bell and Colville site for housing but am opposed to including any of the green belt land behind that site for potential development.

1. East Horsley. The open land around Horsley Towers should remain within the Green Belt. Horsley Towers is of immense historical interest and to build on its surrounding green fields would wreck the prospect of this attractive site. The same argument applies to the possible development of the Thatchers Hotel site. I am not opposed to the development of the former BT brownfield site opposite Bishopsmead Parade in East Horsley, for housing.

1. Land at the Great Ridings Wood end of Norrells Drive, East This large field is adjacent to the above Wood which was donated to and is managed by the Woodland Trust. The field preserves the Wood from suburban encroachment and should be retained as such.

1. Points (a), (b) and (c) above should be retained as such in accordance with National Planning Policy Framework paragraph 83 which states that ‘Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.’ The draft Local Plan mentions “exceptional circumstances” in paragraph 4.123, but presents no evidence that such exceptional circumstances exist. Moreover ministerial guidance has been published that makes it clear that unmet housing need should not normally be taken as such exceptional circumstances. Therefore the existing Green Belt should remain as currently defined.
1. Former Wisley Airfield. This is a large area of Metropolitan green Belt and is valuable farmland – and precious for agricultural use. It provides protected open space near the M25 and is a barrier to outward development from London. Creating a town – almost the size of the Horsleys combined – would cause irrevocable harm to the Green Belt as well as overwhelming local roads and facilities. The A3/M25 junction area is already overwhelmed with traffic for much of the day and has the highest pollution levels outside London.

In conclusion, I ask GBC to revise the housing number, and to amend the Local Plan to utilise brownfield/previously used land rather than green field sites – of which there are significant amounts of the former within the Borough.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16407</th>
<th>Respondent: 11004129 / Alastair Reid</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

As a resident of East Horsley I wish to register strong objections to the Local Plan on a number of counts.

GREEN BELT

Without doubt our Green Belt is precious. It is what protects London from urban sprawl; it preserves air quality; it prevents flooding; it is the city’s playground. It is for us to conserve and protect it. There are 5 legal purposes for Green Belt, and it meets them all:

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

NO EXCEPTIONAL CIRCUMSTANCES

The local plan proposes ~ 9,000 new homes to be built on Green Belt land (compared with ~ 50,000 current homes in Guildford, so approx. equal to 18% of the existing homes in the borough)

The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. Unmet housing need is NOT an exceptional circumstance in law.

In addition the existence of the Green Belt/AONB is a reason for NOT meeting objectively assessed housing need (i.e. such protected land is a legal constraint against any such development). No exceptional circumstances have been disclosed. So the Green Belt boundaries should NOT be changed. To remove most of the Borough’s Villages from the Green Belt would change the nature of this area of countryside forever and would eventually merge historic and separate villages. It would be an environmental outrage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/16408  Respondent: 11004129 / Alastair Reid  Agent:

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

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

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

HOUSING NUMBERS

The housing numbers proposed are for an additional 593 new homes in West and East Horsley within 5 years of adopting the plan. Indeed the proposed increase for West Horsley is an additional 35% of the existing households – the highest in the Borough.

This number is additional to the 2100 new homes planned for Wisley Airfield. This number is far too high for the existing infrastructure to handle and would ruin the nature of the Horsleys.

BROWNFIELD AVAILABLE

There is brownfield land available in the town centre which is being earmarked for commercial development rather than for housing. This is enough to meet our real needs for affordable local homes. There are enough vacant commercial sites to cope with genuine business need, and we have enough retail capacity already, so urban brownfield/derelict land should be used for housing not the Green Belt around our villages. I understand that Surrey University is sitting on permission for 1,500+ accommodation units on its own brownfield campus. If the University fulfilled its obligations much Town Centre affordable accommodation would be available for rental/purchase.

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

Attached documents:
Guildford Proposed Submission Local Plan Consultation

Thank you for inviting the National Farmers Union to comment on the submission draft of the Local Plan. The NFU is an industry representative organisation, which aims to safeguard the farming and growing business interests of our members and to promote conditions for the wider industry to retain a secure and competitive foothold in the UK economy. We represent some 55,000 farm businesses in England and Wales involving an estimated 155,000 farmers, managers and partners in the business, the large majority of commercial farm businesses in England. Our views are generated through consultation with a democratically elected membership structure, representing all sectors of the industry.

The Need for Rural Worker’s Dwellings

The need for new dwellings for agricultural workers (and for employers, farm managers, partners and directors) arises from a number of different circumstances, notably:

- *Succession planning* – where there is only one dwelling on a farm holding, transferring the management of the business from one generation to the next can be difficult.

- *Expansion and change* – where farming practices change and particularly in the case of expansion there may be a need for an additional dwelling.

- *A completely new enterprise* – where there is a new enterprise a dwelling may be justified.

In all of these circumstances there are legitimate reasons why a farm worker is required to live “in sight and sound” of the farm unit. Examples include for the betterment of animal welfare such as managing problem or diseased stock, responding to freezing temperatures or adverse weather and increasingly to manage site security issues.

Without the availability of a farm worker in sight and sound of a new or existing farm unit, the viability of the business can be called into question. It is therefore essential that there is a route through the planning system to enable such developments to take place.

We are extremely concerned that the Plan does not offer any feasible option for the development of privately owned rural workers accommodation.

This is an issue of substantial concern for the farming sector and we request that an appropriate additional or amended policy is included before the Plan is submitted for examination.

As you are aware NPPF 55 states “Local planning authorities should avoid new isolated homes in the countryside unless there are special circumstances such as: the essential need for a rural worker to live permanently at or near their place of work in the countryside”.

Without accommodating the requirements for rural workers dwellings, we highlight the risk that the Plan may not “enable the delivery of sustainable development” in accordance with the NPPF, which according to Paragraph 182 would be grounds to reject the Plan on the basis that it is not sound.

We also consider that in not providing a means by which rural workers dwellings can be built, the Plan may not have considered all of the objective development requirements within the Borough. As such there may be grounds for the inspector to find that the Plan has not have been “positively prepared”.

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

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/15985</th>
<th>Respondent: 11004161 / NFU South East Region (Tom Ormesher)</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H1: Homes for all

Rural workers’ housing appears not to have been considered within the strategic housing market assessment and does not fall into any of the categories within Policy H1 such as “housing for older people”, “specialist housing”, “travellers” or “students”. In this context it appears that the accommodation needs of farm businesses have not been taken into account within the Plan?

We recognise that there might be a feasible option for farms to apply as a “self-build and custom housebuilding project” however this would be subject to compliance with Policies P1, P2 and/or P3, such as:

- **Policy P1 Surrey Hills AONB** – specifies the requirement to comply with NPPF116 “Planning permission should be refused for major developments in these designated areas except in exceptional circumstances”. However it is far from clear to what degree would an application for an essential rural workers dwelling fall within this restriction?

- **Policy P2 Green Belt** – “Buildings for agriculture and forestry” are obviously exceptions to green belt policy under NPPF89, however would a rural workers dwelling fit within this definition of agriculture and forestry?

- **Policy P3 Countryside** – States that “development will only be permitted provided it requires a countryside location or where a rural location can be justified. This seemingly should enable an essential rural dwelling application; however there is no mention of the types of development that will be permitted under this policy.

Whilst there may potentially be a “route through” these various policies, from our perspective it is relatively unclear what the expected outcomes might be where a farm business legitimately requires additional residential accommodation to support their enterprise? We suggest that greater clarity is needed within the Plan to enable the development of essential rural workers dwellings as and when they become a necessity for those relevant businesses.

Our recommendation would be either that an SPD is provided which explains how farms can progress applications for rural workers dwellings, or that the aforementioned Policies H1, H2, P1, P2, P3 are amended to include specific mention of NPPF55 “the essential need for a rural worker to live permanently at or near their place of work in the countryside”.

Finally, we are extremely pleased to see the very clear support for rural growth and expansion that will be delivered through Policy E5: Rural Economy. We congratulate the evident integrated working that has taken place with the Enterprise M3 LEP Rural Action Group. However we are nonetheless concerned that such an aspiration to unlock rural economic growth may be constrained by uncertainty surrounding on farm residential development.

We trust that this comment can be taken into consideration and that the consultation draft can be amended prior to submission. In any case I would be very grateful if you could provide some feedback on my response in order that I might understand your thinking on this issue.

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

**Attached documents:**

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<td>PSLPP16/15984</td>
<td>11004161 / NFU South East Region (Tom Ormesher)</td>
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POLICY H3: Rural exception homes

In our reading Policy H3 does not meet the requirements of NPPF 55 as it restricts the development of rural exception homes to “Small affordable housing developments”.

As you are aware NPPF (page 50 Annex 2) provides a definition of Affordable Housing, which for the purposes of clarity is quoted as:

“Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.

Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable).

Homes that do not meet the above definition of affordable housing, such as “low cost market” housing, may not be considered as affordable housing for planning purposes.”

In nearly every case, the applicant and owner of a rural workers’ dwelling would be a commercial farm business. It would be unlikely and indeed undesirable for a farm business to be considered eligible to be a registered provider of social housing (i.e. as defined in s112 of the Housing and Regeneration Act 2008) and as such any application for a rural exception site is likely to fail if it involves a private commercial farm business.

This precludes the use of Policy H3 within a commercial farming context.

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

Attached documents:
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to remove East Horsley and West Horsley from the Green Belt. Specifically, 173 houses planned at the following locations:

- Thatcher’s Hotel, Guildford Road (48)
- Land near Horsley railway station, Ockham Road North (over the railway from the Village Hall) (100),
- Countryside Depot and Telephone Exchange, St Martin’s Close (15)
- Land at Fangate Manor, St Martin’s Close (10).

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

1. I object to a plan which proposes that over 70% of new housing be built within the Green belt across the Borough. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.
2. I object to the disproportionate local allocation of housing in East Horsley.
3. I object to the threat the Local Plan poses to the historic rural village of East Horsley and the blight on properties there. The plan calls for an additional village of 173 residences in the immediate area, (with narrow lanes, little or no streetlights and many listed houses).
4. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   1. The assertion that the development will result in a meaningful shift to cycling and walking.
   2. The increased volume of car traffic on the roads.
   3. The congestion this traffic will cause on the narrow rural roads in East Horsley and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the limitations of pedestrian footpaths (and the space to provide them).
   5. The lack of suitable public transport. The Horsley rail station will struggle to cope with the proposed increase in passenger traffic and car parking is already at capacity.
5. I object to the fact that insufficient consideration has been given to the environmental and ecological value of these sites.
   1. Pollution: The large increase in volume of traffic will cause an increase in nitrogen dioxide and particulates in the environment.
   2. Flooding: The site behind Ockham Road North in East Horsley is partially a level 3 flood risk area, and local residents are well aware of how much standing water there is in their gardens after rain. Building on such land will only exacerbate the problem.
   3. Schools: Local schools are already at capacity – where will newcomers go to school? No extra places are planned in the Horsleys, and any school places proposed as part of Wisley Airfield will not appear until many years into the project.
   4. Medical facilities: Similar situation to the schools.
6. I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the individual East & West Horsley Parish Plans. The top two responses as to why local residents enjoy life in East Horsley are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

I trust that these objections will be fully considered and that the proposed plans for an additional 173 residences in East Horsley is removed from the Local Plan with immediate effect.

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

Attached documents:

Comment ID:  PSLPA16/3054   Respondent:  11005281 / Simon Quincey   Agent:

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

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

Representations to Oppose The Guildford Borough Local Plan for Horsley

I write to oppose the proposed plan to (i) remove West Horsley, East Horsley and other villages from the green belt, (ii) develop extra homes in Ockham, Burnt Common and Gosden Hill Farm, and (iii) enlarge the two village Settlement Areas (hereafter referred to as The Guildford Plan.)

My wife and I live in Weston Lea and will be directly affected by The Guildford Plan. Our home, our views and our social lives will be greatly impacted by the imposition of The Guildford Plan and, in our view with no beneficial consequence to the residents of Horsley.

The Green Belt status is imposed for the purpose of controlling urban growth and in order to maintain agriculture, forestry and outdoor leisure. Its purpose is to prevent unnecessary urban sprawl and can and will be resisted vigorously.

The objectives of The Guildford Plan is clearly based on economical gain for the council and will bring no benefit to residents and visitors to this part if Surrey. The construction of extra homes will impose on the countryside views that West and East Horsley have to offer. It will increase traffic flow and population and diminish the exquisite characteristic of each part of the village.

I am sure you are aware of the consideration you must pay to the National Planning Policy Framework which states that The Green Belt ensures; access to the countryside, outdoor sport and recreation, retention of landscapes, improvement of damaged land, nature conservation and retention of agriculture. It is design to prevent; the sprawl of built up areas and the merging of neighbouring towns. It is also designed to safeguard the countryside from encroachment and preserve the setting and character of the town.

The proposals thus far have indicated a clear desire for financial gain alone. The economical cost of The Guildford Plan must also be considered. These will include; the unsustainable burden on the drainage system, the road networks, medical services, schools, parking and public transport. There is no proposal to support and expand these areas and if there are, no doubt the cost of such things will be borne out in our council tax charges. In my view, these areas are already overwhelmed by the over populated schools and medical facilities.

From my perspective, my view of the countryside and forestry will be removed and replaced with a development site resulting in the brick work of the newly constructed homes. The impact on my light will not be known until planning permission is applied for by which time, we as the residents will have already lost this beautiful Green Belt Land.

Horsley was not given so much Green Belt status for it to be removed by a council suffering financial difficulties at a time of economic downturn. Finances and the increasing of profit is clearly outweighed by the need to preserve and protect nature and character and thus the proposed changes should be refused.

I hope that my representations are considered favourably and a response is provided as soon as possible.

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

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Horsley was not given so much Green Belt status for it to be removed by a council suffering financial difficulties at a time of economic downturn. Finances and the increasing of profit is clearly outweighed by the need to preserve and protect nature and character and thus the proposed changes should be refused.

I hope that my representations are considered favourably and a response is provided as soon as possible.

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

**Attached documents:**
I am categorically against any development of homes on Wisley airfield.

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

Attached documents:

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The area is already hopelessly overstretched with high levels of traffic, the current infrastructure and all of the important local amenities all being insufficient to support the additional numbers of people that would potentially occupy any new homes in the area.

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

Attached documents:

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I firmly object to the New Local Plan 2016.

I live in East Horsley and I am absolutely against all measures to reduce the green belt in this area most particularly by removing any part of East Horsley village (and other neighbouring villages) from this green belt. A massive increase in the housing stock of the Horsleys of 593 new houses represents something like a 35% increase. Nowhere can I see ANY justification for this requirement other than a badly worked consultant's report which is based upon some wildly inaccurate forecasts.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6475  Respondent: 11005377 / Peter Robinson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

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

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

I understand that there are "brown field" sites involved in this plan but if the plan is approved it is almost certain that with the difficulties of getting full approval for these sites it is most probable that there would be enormous pressure on developing green field sites first. This is a really alarming consideration given that the Wisley development is projected to be over 2000 houses and there would be enormous pressure to develop this site very early on in the future

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

Attached documents:

Comment ID: pslp172/2946  Respondent: 11005473 / Nick Thomas  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

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

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

1. Policy A42. Clockbarn Nursery, Tannery Lane, Send. Allocated for 60 houses in place of the previous 45 houses. Apart from being lined both sides with green fields for much of its length, Tannery Lane is a narrow route turning off from the middle of Send and where it turns off there is existing development either side adding to the traffic turning into it will cause further delays through the middle of the village and require a significant amount of infrastructure work.

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

Attached documents:

Comment ID: pslp172/2947  Respondent: 11005473 / Nick Thomas  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

1. Policy A43. Garlick's Arch, Kiln Lane, Send Marsh - still allocated for 400 houses; addition of 6 Travelling Showpeople plots. We understand that these additions will involve parking for large vehicles and storage space, just adding a little more to an already very, very large development which will ride roughshod through ancient woodland and cause major jams on surrounding roads, especially in conjunction with the following point.

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

Attached documents:

Comment ID: pslp172/2948  Respondent: 11005473 / Nick Thomas  Agent:

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

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

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

1. Policy A 58. 9.26 hectares at Burnt Common, for an initial minimum of 7,000m2 of industrial space. This is by far the biggest potential problem with the latest round of changes. GBC have changed two little letters here - 'maximum' becomes 'minimum' and the possibility is thus opened up of a huge new development on Green Belt land, in a location where there is actually, according to recent research, reduced demand for industrial space. Such industrial development will cause very heavy additional traffic on the surrounding roads, where there are already long queues in the rush hour. I'm genuinely baffled by what passes through the heads of GBC on this issue: they must have cars, they must sometimes sit for long periods as we do in jams going up the hill past the university on the A3 or indeed on the A3 northbound past the Potter's Lane and Ripley turn-offs; or find their routes to school or work are solid due to the smallest roadworks; and yet they're quite happy to say they're addressing the problem of accommodation for people working in schools and hospitals in Guildford not by providing houses in the immediate vicinity of the town but by building a mini-commuter belt in Wisley, Horsley, Send etc... from which people will need to climb into their cars by the thousand and head off into the complete gridlock the Plan will have created. Except of course that most of the new housing won't be affordable, as above, so most of the cars may be heading the other way, into London.

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

Attached documents:

Comment ID: pslp171/1339  Respondent: 11005473 / Nick Thomas  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

The plan as it relates to Send is flawed on three levels:

- the calculation of housing requirement for the Borough as a whole is extremely spurious, based on wrong assumptions about industrial demand, classification of university students and the indiscriminate imposition of national-level requirements on individual regions

- the share of the burden of development to be placed on Send and its environs has been from the first draft suggestive of a very poor attitude to complying with the demands of government. Rather than 'how can we spread this requirement fairly across the Borough', the Council appear to be asking 'which few parishes can we sacrifice in the interests of keeping the others relatively happy'. More important in my view, the Council's disregard for the Green Belt has been shocking: the Act requires 'exceptional circumstances' for areas to be removed from the Belt, while the current justifications for development are the most unexceptional imaginable - ongoing pressure of population and increasing demand for housing. This is exactly what previous governments committed not to doing.

In spite of this, we see the Plan focusing on new build in areas such as Send, Ripley and Wisley where it's easy and cheap to carve up the countryside, rather than making a serious attempt to use the Borough's extensive brownfield capacity to cover a high proportion of the development. The official line seems to be to talk about affordable housing and insinuate that those objecting are NIMBYs: but given the choice of sites (highly unpopular but the most profitable for development) and the decision to make a minimum of only 40 percent of houses built on land freed up for development 'affordable' (equivalent to perhaps 25 percent of the land thus freed up) - leaving developers rubbing their hands over the other 75 percent, it's hard to keep faith in the Council's having any other motive than greed.

If you want to free up land for affordable housing, why not use *all* that land for affordable housing, and make sure the developers get a decent price for their work? Then we'd be talking about 25 percent of the current land grab and you might get a less furious response from residents ['though it should still be brownfield]. The fact that the Council is far more worried about the developers' feelings than those of the local residents, speaks volumes.

- most specifically, the effect on Send of the proposed developments will be to cripple the already creaking road system, massively overload schools and medical facilities, undermine the environment and - in short - ruin the village. It's far from perfect at the moment but I can say hand on heart that it's quite a nice place to live. It seems likely to be a truly grim place to live if the Plan goes through.

It's the third of these I want to focus on for the remainder of this email, and as instructed I shall focus on changes made since the previous draft - but please note none of the objections raised previously have been addressed and you should still give these full consideration.

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

Attached documents:
I object to the proposed development of more than 2000 houses on the site of the former Wisley Airfield as the impact of this on the Horsleys which are less than 2 miles away would be completely unacceptable

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

Attached documents:

Comment ID: PSLPP16/5737  Respondent: 11005697 / Mike Gilbert  Agent:

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

I object to the proposed extension of the boundaries of the settlement areas of the Horsleys as no good reasons have been provided

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

Attached documents:
### Comment ID: PSLPP16/16605  **Respondent:** 11005697 / Mike Gilbert  **Agent:**

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

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

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

I object to the proposal to remove the Horsleys from the Green Belt as there are no exceptional circumstances to make this a valid option.

I object to the proposed extension of the boundaries of the settlement areas of the Horsleys as no good reasons have been provided.

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

**Attached documents:**

### Comment ID: PSLPP16/5735  **Respondent:** 11005697 / Mike Gilbert  **Agent:**

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

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

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

I object to the new Guildford Local plan as there is no explanation as to how the number of houses required in the borough has been calculated and this is fundamental to the plan.

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

**Attached documents:**

### Comment ID: PSLPP16/16604  **Respondent:** 11005697 / Mike Gilbert  **Agent:**

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

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

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
I object to the new Guildford Local plan as there is no explanation as to how the number of houses required in the borough has been calculated and this is fundamental to the plan.

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

Attached documents:

Comment ID: PSLPS16/1089  Respondent: 11005729 / Andrew Rowe  Agent:

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

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

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

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

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

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

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5. I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

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

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.

   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.

   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

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

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

3. I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

4. I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

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

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

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

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

Attached documents:
unsustainability, the inappropriateness of an urban style development in this rural area, the major impact on local villages. These are all still relevant objections.

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

Attached documents:

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**Comment ID:** PSLPP16/8543  **Respondent:** 11006145 / Peter Bradshaw  **Agent:**

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

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

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

**Infrastructure**

The infrastructure of the Horsleys is already overloaded. Local Schools are full, the medical centre is stretched, drainage is inadequate. Traffic and parking are already an issue and at high levels. There is little scope for improvement currently and the scale of development proposed is completely out of all proportion to the facilities available and the ability to increase those facilities. I note that in the proposal for 2000 houses on Wisley airfield they identify Horsley station as a transport link. Anyone who has bothered to visit Horsley will know that the station car park is already at near capacity. There is no provision in the Local Plan to improve this infrastructure in proportion to the proposed building.

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

Attached documents:

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**Comment ID:** PSLPP16/8541  **Respondent:** 11006145 / Peter Bradshaw  **Agent:**

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

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

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

**Proposal to inset East Horsley from the Green Belt Policy**

I OBJECT to the proposal that East Horsley should be inset from the Green Belt, instead of being ‘washed over’ as it is today. East Horsley is set in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving that character. Moreover, being ‘washed over’ by the Green Belt has not been a serious constraint on development within the village. Woodlands and large residential gardens make a vital contribution towards biodiversity, provide wildlife corridors, and furnish those open spaces which are vital to the character of the greenbelt. Removal of the Horsleys from the Green Belt would require exceptional circumstances and these have not been demonstrated. There is no consideration in the plan of the effect of such insetting upon the villages and this is required by the National Planning Policy Framework.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8542  Respondent: 11006145 / Peter Bradshaw  Agent:

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

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

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

Changes to the Settlement Boundaries

I OBJECT to the proposed Settlement Boundary changes in East Horsley. GBC are proposing to make a number of changes to the settlement boundaries of East Horsley and so expand the settlement area, as set out in the Proposals Map. The changes to the settlement boundaries in the Horsleys appear to have been done purely on the basis of including additional Greenfield sites which can then be built on. I can see no reasons given for the proposed changes and therefore the boundaries should remain as they are.

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

Attached documents:

Comment ID: PSLPP16/8540  Respondent: 11006145 / Peter Bradshaw  Agent:

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

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

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

Housing Needs Numbers

I OBJECT to the housing needs numbers included in the local plan as far too high.

An annual build of 693 new homes per annum represents a net increase of 25% in the housing stock of Guildford Borough, a remarkable rate of increase for a borough in the English Home Counties. It is even more remarkable when the official statisticians at the Office of National Statistics are projecting a population increase of some 15% for Guildford Borough over this same period. In particular over 23% of this new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys, totally out of proportion to the population living there.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
| Comment ID: pslp171/2678 | Respondent: 11006209 / Terry & Serena Coates | Agent: |
| Comment ID: PSLPA16/2565 | Respondent: 11006241 / Sally Harrison | Agent: |

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

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

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

Five-year Supply of Housing Land
The 2017 Addendum to the LAA sets out the five year housing requirements 2019 - 2024 and the identified supply. Applying the 20% buffer as a consequence of persistent under-delivery, there is a shortfall over the five year period of some 881 units. Planning for a shortfall in the five year housing land supply at the outset of the Plan period, cannot be considered to be effective and the Plan is therefore currently considered unsound in this respect.

Where there is scope to increase the quantum of development on previously developed land this should be considered and an adjustment made to the proposed allocation sites accordingly.

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

Attached documents:

I am writing to object to the proposals for development in Send and Ripley. I am a Send resident. My family arrived in Send in 1968 and I lived here until my marriage 13 years later in 1981, returning to Send in 1995 after my parents’ deaths. During my time elsewhere I kept close contact with Send where I continued to worship at St Mary’s Church and help at the Church Youth Group.

I object to the persistent changes in Guildford Borough Council’s proposals, involving widely fluctuating numbers, sudden additions to the plans, and inadequate consulting processes. I object because the GBC needs to work out a properly considered plan. I object because I do not believe evidence exists for the GBC’s proposals.
I object to the proposal to remove Send from the Green Belt, ie insetting, specifically to land behind Heath Drive and Send Road as well as land near Send Hill and St Bede’s Junior School’s current location. This is on the grounds that our village, as well as Ripley village, is in danger of becoming part of a larger conglomeration, as land is gradually turned to housing estates and put to industrial use. Once these initial proposals are improved there will be no stopping developers taking yet more land for their lucrative businesses.

I also object because the local wildlife is also being threatened by all the proposed developments. Foxes, badgers, deer, owls, bats are just some of the local fauna at risk of being driven from their homes and breeding sites.

I further object on the grounds that the Wey Navigation is a beautiful part of our county and views from the water and towpath are going to be compromised. This is a loss to local residents as well as those who visit Send, many arriving by boat or on foot along the towpath.

I particularly object to the land behind St Bede’s School and near Send Hill being removed from Green Belt status when it was stated at the time of permission being granted for the relocation of the school that this land would return to Green field when the current school was demolished.

I object to the fact that Send Lakes will lose their SNCI status. These are at present well tended and a joy for many people locally. I object because the area surrounding the lakes is rich in wildlife, both flora and fauna and removing the special status could easily lead to lack of maintenance, also increasing the risk of flooding.

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

Attached documents:

Comment ID: PSLPS16/5259  Respondent: 11006241 / Sally Harrison  Agent:

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

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

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

I object to the proposal A42 concerning Clockbarn Nursery in Tannery Lane. This is on the grounds that this is a lane, narrow in many places and not suitable for accommodating more traffic which will arise with the construction of 45 more houses. I object because the junction with Send Road is also already very difficult to navigate and I foresee potential accidents as well as congestion. I object because the construction of a marina has been granted permission already which will again increase traffic along Tannery lane. I object because there is also a flooding risk along the lane which has not been resolved. I object because of the fauna (many bats nest here) and flora which will be compromised

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

Attached documents:

Comment ID: PSLPS16/5261  Respondent: 11006241 / Sally Harrison  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

I object to proposal A43 concerning housing development at Garlick’s Arch. I object because the development means the loss of ancient woodland, rare in this area, which is home to local fauna, notably hares in this instance, and which is full of bluebells in spring. I object because I believe the woodland helps to keep noise from the A3 at bay, protecting Send Marsh residents in particular. I object because the villages of Send, and indirectly Ripley, are ill equipped to accommodate such a large development. I object because there is a very poor bus Public Transport network linking the villages to Guildford, Woking and towns further afield, and it will additionally mean more environmental damage with everyone relying on their private vehicle because of the lack of buses. I object because for Send this means an increase of 25% in the number of residents and it is not fair that one small village should be swamped by this development. I object because the villages do not have the required infrastructure: overstretched medical facilities, a lack of Junior/Primary School spaces, insufficient shops, as well as a paucity of Secondary education places in this area, meaning children being transported at cost by numerous coaches morning and evening to ensure they arrive at their place of education. I object because the Portsmouth Road will become even more of a nightmare owing to congestion from traffic. I object because a much smaller housing development was rejected a few years ago and the same reasons for the application being turned down then still exist (the refusal stated that the application represented inappropriate development in the Green Belt and also was unacceptable for various reasons because the site was within the 400m to 5km zone of the Thames basin heaths Special Protection Area - has the TBHSPA moved?), so I fail to understand this more recent, unexpected, proposal.

I object to this proposal A43 in addition on the grounds that an industrial site is totally out of keeping with the locality and totally undesirable adjacent to a housing development. The proposed four way junction on the A3 here is, I understand, being facilitated by the permission granted to the landowner for the housing development. I object that this payback is disproportionate. I object because it suggests that financial greed is an overriding factor in considering this development, not a well considered plan to provide accommodation for a needy population.

I object to proposal A43, i.e. the north and south bound slip roads onto the A3 which were considered inappropriate when the road was constructed. I object because the local residents will suffer undesirably from the increase in traffic and noise. I object because some of the adjacent land is currently farmed and increased pollution will be unacceptable. I object because it will bring yet more traffic from outside the village through Send, especially large vehicles, and there is already an issue at peak travelling times along the A247 including Send Road, Send Barnes Lane and Broadmead, not to mention the road through West Clandon.

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

Attached documents:
I object to the proposal A42 regarding the development on Send Hill, west of wind’s Ridge, of a small estate and the
 provision of two travellers pitches. I object on the grounds that Send Hill is not suitable for an increase in traffic, especially
 at the Potters Lane end. The road is far too narrow. I object to the construction of housing as this is also a beautiful part of
 the village with much wildlife living there. It is a place where many people walk. I object because this site is landfill and
 there is a possible problem with gas escape and contamination.

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

Attached documents:

Comment ID: pslp172/3949  Respondent: 11006241 / Sally Harrison  Agent:

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

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

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

My first objection is to Policy A42 where the number of houses proposed has increased from 45 to 60 ie an increase of
33% which is enormous.

Tannery Lane is a problem for traffic as it is, as a result of inadequate parking in Send, making the junction with Send Road
difficult to navigate at most times of the day. The lane is also very narrow. As with many residential developments,
inadequate parking provision for residents and their visitors will lead to them parking on Tannery Lane, aggravating the
situation. Increased housing will bring even more people in cars onto the A 247 which is congested at peak times and busy
during the rest of the day as it is a cut through to Woking from the A3, and furthermore regularly used as a training route
for HGVs. Together with the proposals for a new junction with the A3 at Burnt Common, which will bring yet more traffic
through the village, this is going to be a serious problem.

This development will also impact negatively on views from the Wey Navigation.

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

Attached documents:

Comment ID: pslp172/3950  Respondent: 11006241 / Sally Harrison  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
My second objection is to Policy A43 where 6 Travelling Showpeople Plots are now proposed. I have already objected to the number of proposed new homes and these objections stand. Now I would like to know: What evidence and which “exceptional circumstances” are being used as justification for this new requirement? The proposal to remove an ancient woodland with its wildlife population and replace it with residential development and Travelling Showpeople Plots is ignominious. The development here will create one vast housing estate in combination with the Send Marsh (Wimpey) estate on the other side of the road and more or less join up Send and Ripley.

I see no way in which Send and Ripley can accommodate such an increase in demand for medical facilities, schools and shops. I am sure you can also see that there will be another inevitable increase in the traffic using the local roads which are already busy and congested for a large part of each day. Here I will point out the speeds of the vehicles travelling along Send Barnes Lane in the vicinity of Send Primary School. There is a real danger to the school children at the start and end of the school day. The attempt to reduce speed by moving the speed restriction sign has not been very effective.

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

Attached documents:

Comment ID: pslp172/3951  Respondent: 11006241 / Sally Harrison  Agent:

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

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

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

My third objection is to Policy A58. This development was removed from the 2014 draft because of objections which are still relevant. The proposed site is vast at 10 hectares and to be on Green Belt land. I understand that the demand for such industrial and warehouse development has decreased. So why is an increase apposite here? Also it is not satisfactory to use the word minimum instead of maximum as this opens the way for yet further development. Would it not make more sense to use sites already designated for such purpose such as at Slyfield?

Yet again the impact of increased traffic, and in this case heavy traffic, is a major concern for the area.

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

Attached documents:

Comment ID: pslp171/2022  Respondent: 11006241 / Sally Harrison  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
Finally I object to taking Send Business Park out of the Green Belt. **Policy 2 paragraph 4.3.15.** The current development should never have taken place. It is in an area of beautiful countryside right next to the charming Wey Navigation. The tow path is regularly used by walkers and the water used by boats and canoeists. It will spoil this area for everyone's leisure use completely.

I am repeating myself but it also creates more problems for Tannery Lane which is totally unsuitable for larger vehicles in both directions.

I appeal to you to consider these objections seriously, to draw up a plan which is fair to all residents in Surrey, and in particular a plan which respects our natural environment and does not encroach on Green Belt.

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

**Attached documents:**

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**Comment ID:** pslp17q/376  **Respondent:** 11006241 / Sally Harrison  **Agent:**

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

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

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

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I am writing to object to several changes on the new local plan which affect the area where I live.

It is clear that all previous objections to proposed local plans have been ignored.

I am particularly concerned about the increase in proposed residential development in a village where there is already inadequate provision in the form of medical facilities, schooling, and shops.

In your documents you refer to protecting the environment but by removing Send from the Greenbelt you are not doing this.

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

**Attached documents:**

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**Comment ID:** PSLPA16/4223  **Respondent:** 11006625 / Stephen Giles  **Agent:**

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
With regard to your resubmission of Guildfords Local Housing plan in respect of the areas of East Horsley, West Horsley, Ockham and Wisley, we feel that you as a borough council are tying to push your points with little regard for the environment, on ecological and humanitarian levels.

Whilst we appreciate that new housing needs to be addressed we feel that there are better sites to build on than large tracts of green belt.

So far there has been no indication of increasing the necessities of living in the areas mentioned above, i.e. more or larger schools; more or larger doctors. How will the communities cope with the increase in cars. At the moment East and West Horsley are being used as cut throughs when the A3 and M25 are blocked, cars leaving the A3 at Pains Hill to get to Guildford, HGVs and coaches leaving at junction 9 or 10 on the M25 and travelling up and down Ockham Road North and South to bypass the traffic jams and added to this, you wish to inflict more misery to the current occupants of East and West Horsely by increasing the amount of cars in the area.

The Guildford Council always inform us that they do not have the resources for repairing the roads, how is increasing the amount of cars using the roads going to help this. East Lane and the Street has not been repaired for several years. All we get is the odd pot hole filled in when it reaches a depth of six inches and becomes dangerous but the general road service of both these roads is breaking up.

The council states that the train service will be used. With Southern cutting 341 trains, how long will it be before that situation affects South West Trains and the roads become more congested?

All of this pays a big part in the health of the current occupants with pollution reaching levels that our government are trying to reduce.

Since the last major floods, drainage has been improved, but Ripley Lane still floods on a regular basis. With the addition of more houses many of the underground streams will have their flow compromised and more flooding will be the result. Would you wish Surrey to become another Somerset?

We have been informed that the council has plenty of brownfield sites that could be regenerated but the council seems determined to ignore these.

Every time the people of Guildford and surrounding areas show their objection for building on Green Belt land the more determined the council appears to ignore their wishes.

In conclusion we strongly object to the Local Plan in that it does not give enough thought to the current residents standard of living, inflicting hardships that when moving into the area they never thought they would have to endure.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPA16/2518</th>
<th>Respondent:</th>
<th>11007073 / Gyles McIver</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
<td></td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick's Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

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

Attached documents:

Comment ID: PSLPA16/2517  Respondent: 11007073 / Gyles McIver  Agent:

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

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

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

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

The Plan's proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

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

Attached documents:

Comment ID: PSLPS16/5208  Respondent: 11007073 / Gyles McIver  Agent:

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

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

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

I object to the inclusion of the land at Garlick's Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch is protected from development as it is classified as Green Belt. There are no exceptional circumstances which allow for its removal from the Green Belt (Policy P2).

Central Government state clearly that housing need is not an exceptional circumstance.
The site is wholly inappropriate because:

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

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

Attached documents:

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Comment ID: PSLPS16/5210  Respondent: 11007073 / Gyles McIver  Agent:

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

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

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

I object to the employment strategy and impact at Garlick's Arch (A43) (Policies E2 and E3)

There is no need for new industrial sites at Garlick's Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.

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

Attached documents:

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Comment ID: PSLPP16/10419  Respondent: 11007073 / Gyles McIver  Agent:

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

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

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

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

The Garlick's Arch (A43) proposal would permanently destroy the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

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

Attached documents:
I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy 11)

There is already far too much traffic in our villages and this plan will further create more congestion in Ripley, Send and Glandon. The existing roads are in poor quality and in particular the rural roads are extremely narrow and in some areas there is no provision for footpaths or cycle lanes.

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

Attached documents:

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I object to the lack of proper infrastructure planning for sites (Policy 11)

The Plan does not identify suitable infrastructure improvements to provide the huge scale of development, especially at Garrick's Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Localservices, utilities and sewerage, medical services and schools are already nearing full capacity.

I wish these objections to be fully taken into consideration and that the Plan is amended accordingly.

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

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

I object to poor air quality concerns (Policy I 3)
Due to the increased number of cars the area will be subjected to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

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

Comment ID: PSLPP16/10417  Respondent: 11007073 / Gyles McIver  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

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

I object to not protecting the Green Belt (Policy P2)
I object to removing Ripley, Send and Glandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43) there are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

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

Comment ID: PSLPP16/10418  Respondent: 11007073 / Gyles McIver  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick's Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council's own assessment. This area has flooded on numerous occasions in recent years and therefore the Council's assessment is not sufficient to be included in the plan.

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

Attached documents:

Comment ID: PSLPP16/10415  Respondent: 11007073 / Gyles McIver  Agent:

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

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

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

I object to the Local Plan as the development proposed is not sustainable (Policy S1)

The proposed number of 13,860 new houses in the area of Ripley, Send and Glandon is not sustainable. This development will ruin the local community and surrounding area, as there are no railway services, for Wisley Airfield (A35) and Garlick's Arch (A43) and the bus services are inadequate, it will bring more cars to the area as most households have more than one vehicle.

The Plan has nothing to improve the infrastructure for Garlick's Arch.

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

Attached documents:

Comment ID: PSLPA16/3578  Respondent: 11007201 / Valery Smirnov  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
Comments on Proposed Submission Local Plan: Strategy and Sites 2016

Policy A36, A37, A38, A39, A40, A41: Site Policy – developments in Horsleys

I OBJECT to this policy.

The above sites are within the designated Green Belt area.

Per NPPF, “inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances”. The proposed developments are inappropriate by their scale and nature, especially within Green Belt. It will make the Horsleys a town, not a village, so perhaps, the Council should think of consulting the residents on a proposal to change the status first.

There is nothing in the above policy proposals to demonstrate the required “exceptional circumstances”.

The proposed increase in the housing stock is considerably above of the current level of 15% population increase. Our infrastructure and local facilities and amenities are already under a lot of strain, our roads are not able to cope with any further increase in traffic - all of which need a considerable investment even without the proposed developments. If the Council struggles to find the funds now, what state of these would be following a dramatic jump in the population resulting from the proposed developments?

The proposed developments will make an irreversible footprint on the environment, forever destroying the natural beauty that is so much cherished and enjoyed by everybody who lives or visits our area.

While I appreciate the need for new dwellings, available brownfields should be allocated to meet this need in the first instance. The proposed plan however has not demonstrated sufficient consideration of the available brownfield sites potential.

I am very concerned that the local authorities, having already held a consultation in 2014 resulting in a high number of registered objections, still continue with the outlined proposals in what appears to be a single-minded and dictatorial style of approach. I strongly object to all proposed developments in policies A36-A41 and hope that my voice will be heard.

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

Attached documents:

Comment ID: PSLPS16/6878  Respondent: 11007201 / Valery Smirnov  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to this policy.

This area provides farmland and should be designated for agricultural use. It sets a natural border to an outward development from London from M25. Creating a town with about 2,100 homes (almost the size of the Horsleys itself!) would increase the density of population to the unsustainable level. Our roads and facilities are very limited even at present, and the expansion of the population to such an extent would not only require a full review and redesign of the local infrastructure, but it would also bring about a considerable destruction of the surrounding woodland and areas widely regarded as Outstanding Natural Beauty.

This development appears to be gigantic in size and disproportionate in scale and surely is at the extreme scale of developers’ opportunism, hand-in-hand with the local authorities who, instead of protecting the local interests seem to be only too happy to let it go without giving unduly consideration to the harm it would do to the existing residents in all shape or form – be these humans or flora and fauna.

Finally, I should like to point out that the site is located in the heart of Surrey Green Belt. The development will irrevocably disfigure the faces of the surrounding villages, including the Horsleys.

I, alongside with my fellow residents, believe that there is no case and no place for this development.

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

Attached documents:

Comment ID: PSLPP16/14980  Respondent: 11007201 / Valery Smirnov  Agent:

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

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

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

I OBJECT to this policy.

I particularly protest at the “insetting” of 14 villages from the Green Belt and at “infilling” 12 Green Belt villages. It is disturbing to learn of the proposed extension to the settlement boundaries in many villages which will inevitably lead to numerous overdeveloped areas and a total extinction of the rural feel and the surrounding countryside.

Having reviewed the above policy, I note that the NPPF’s other 4 tests of Green Belt status including the prevention of urban sprawl have been ignored. The policy also states that “the general extent of the Green Belt has been retained”, which is a misrepresentation.

Policy P2 seeks to justify excessive development on the Green Belt designated land without demonstrating exceptional circumstances required for alterations of the existing Green Belts boundaries.

I object to this policy on moral and national grounds. Our surrounding nature and villages are the assets that should be protected not only for the sake of our own, but also for generations to come. It will be impossible to undo the damage inflicted once Green Belt boundaries are removed, opening up the area to developments that are for over-ambitious and distractive to the local nature and culture.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to the proposed Infrastructure Schedule (Appendix C)

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

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

Attached documents:

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

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

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

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

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

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

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

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

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

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

Attached documents:

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<th>PSLPS16/6964</th>
<th>Respondent:</th>
<th>11007393 / James Culmer</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
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I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

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

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

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

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

Note the following accident data:

2010 - 2014 from Crashmap data

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

2015

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

2016

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

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

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).
The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to Policy A43 and A43a on Garlick’s Arch.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

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

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

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

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

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)
I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

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

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

Attached documents:

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Comment ID: PSLPP16/15344  Respondent: 11007393 / James Culmer  Agent:

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

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

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

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

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

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

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

Attached documents:

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Comment ID: PSLPP16/15290  Respondent: 11007393 / James Culmer  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the sustainable employment policy (Policy E1)

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPP16/15295  Respondent: 11007393 / James Culmer  Agent:

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

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

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

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

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

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

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15300  Respondent: 11007393 / James Culmer  Agent:

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

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

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

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

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

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

Attached documents:

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Comment ID: PSLPP16/15352  Respondent: 11007393 / James Culmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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

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

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

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

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

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

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

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

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

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

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

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

I OBJECT to Policy E7 Guildford Town Centre

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

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

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.
The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

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

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

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

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

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

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

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

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

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students IRE accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university’s ability to house its own students and reduce the housing number accordingly.

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

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

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

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

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

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

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

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

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

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

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

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

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPP16/15309 Respondent: 11007393 / James Culmer Agent:

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

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

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

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

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

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

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

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

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

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

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

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

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.
Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

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

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

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

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

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

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

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

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

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

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15324  Respondent: 11007393 / James Culmer  Agent:

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

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

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

I OBJECT to poor air quality concerns (Policy I3)

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

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

Attached documents:

Comment ID: PSLPP16/15280  Respondent: 11007393 / James Culmer  Agent:

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

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

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

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

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

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

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

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

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

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

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

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

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

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

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.
There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

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

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

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

Attached documents:

Comment ID: PSLPP16/15285  Respondent: 11007393 / James Culmer  Agent:

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

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

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPP16/15270  Respondent: 11007393 / James Culmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

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

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

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

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

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

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

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

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

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

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. The road (A247) through West Clandon is particularly hazardous as, in a number of places, two large vehicles are unable to pass in opposite directions without mounting the pavement. Further vehicle movements will result in even more acute congestion, greater pollution and an increased risk of fatal accidents. Residents and the environment will suffer as a result.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15275  Respondent: 11007393 / James Culmer  Agent:

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

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

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

I OBJECT to the Borough Wide Strategy (Policy S2)

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

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

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is not justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

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

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

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

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

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

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

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

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

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

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

Attached documents:

Comment ID: SQLP16/1703  Respondent: 11007393 / James Culmer  Agent:

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

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

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

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

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

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

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

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

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

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

Attached documents:

Comment ID: SQLP16/1708  Respondent: 11007393 / James Culmer  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

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

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

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

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

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

Attached documents:

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**Comment ID:** SQLP16/1713  **Respondent:** 11007393 / James Culmer  **Agent:**

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

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

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

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

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

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

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

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

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

Attached documents:
**Comment ID:** SQLP16/1718  **Respondent:** 11007393 / James Culmer  **Agent:**

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

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

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

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

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

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

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

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars.

6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.

7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

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

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

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPA16/2522  Respondent: 11007425 / Kate McIver  Agent:

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

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

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

I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 11007425 / Kate McIver</th>
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I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan's proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

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

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I object to the employment strategy and impact at Garlick's Arch (A43) (Policies E2 and E5)

There is no need for new industrial sites at Garlick's Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.

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

Attached documents:
Comment ID: PSLPP16/10445  Respondent: 11007425 / Kate McIver  Agent:

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

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

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

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

The Garlick's Arch (A43) proposal would permanently destroy the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

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

Attached documents:

Comment ID: PSLPP16/10442  Respondent: 11007425 / Kate McIver  Agent:

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

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

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

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

There is already far too much traffic in our villages and this plan will further create more congestion in Ripley, Send and Glandon. The existing roads are in poor quality and in particular the rural roads are extremely narrow and in some areas there is no provision for footpaths or cycle lanes.

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

Attached documents:

Comment ID: PSLPP16/10447  Respondent: 11007425 / Kate McIver  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the lack of proper infrastructure planning for sites (Policy I1)

The Plan does not identify suitable infrastructure improvements to provide the huge scale of development, especially at Garlick's Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, medical services and schools are already nearing full capacity.

I wish these objections to be fully taken into consideration and that the Plan is amended accordingly.

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

Attached documents:

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I object to poor air quality concerns (Policy I3)

Due to the increased number of cars the area will be subjected to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

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

Attached documents:

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

I object to removing Ripley, Send and Glandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43) there are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

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

Attached documents:
Comment ID:  PSLPP16/10444  Respondent: 11007425 / Kate McIver  Agent:

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

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

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

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

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick's Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council's own assessment. This area has flooded on numerous occasions in recent years and therefore the Council's assessment is not sufficient to be included in the plan.

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

Attached documents:

Comment ID:  PSLPP16/10440  Respondent: 11007425 / Kate McIver  Agent:

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

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

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

I object to the Local Plan as the development proposed is not sustainable (Policy S1)

The proposed number of 13,860 new houses in the area of Ripley, Send and Glandon is not sustainable. This development will ruin the local community and surrounding area, as there are no railway services, for Wisley Airfield (A35) and Garlick's Arch (A43) and the bus services are inadequate, it will bring more cars to the area as most households have more than one vehicle.

The Plan has nothing to improve the infrastructure for Garlick's Arch.

The development should be relocated to urban areas where there is sustainable transport.

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

Attached documents:

Comment ID:  PSLPA16/1658  Respondent: 11007713 / Grahame Crispin  Agent:

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

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

I OBJECT to the validity of Guildford Borough Council’s evidence base used to demonstrate a need for the above Policies being objected to (namely P2, A42, A43, A43a, A44).

Required Employment space versus 2015 ELNA & 2013 ELNA has been overstated.

Housing needs (2015 SHMA) have been overstated by including, for example, foreign students.

The number of houses that is suggested as being required has been exaggerated by GBC; a more realistic lower requirement could be satisfied by the re-use of brown-field sites, and Green Belt land does not need to be encroached into.

At the time it was voted upon (24/5/16), Guildford Borough Council’s Local Plan did not take account of Guildford Borough Council’s Transport Assessment (not available until weeks afterwards on 6/6/16).

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

Attached documents:

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Comment ID: PSLPS16/3195  Respondent: 11007713 / Grahame Crispin  Agent:

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

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

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

I OBJECT to Policy A42 (45 houses at Clockbarn Nursery Tannery Lane Send).

Tannery Lane is too narrow to support the additional traffic that would be generated by any development that this policy provides for, the junction with Send Road will become significantly more hazardous than it already is, and the network of lanes around Papercourt and towards Ripley will become more of a cut through and dangerous.

Development of the site would destroy a valuable Green Space habitat, and destroy the buffer between Send Village and the Tannery Lane Industrial area.

The site must NOT be developed and the Policy must be abandoned

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

Attached documents:

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Comment ID: PSLPS16/3193  Respondent: 11007713 / Grahame Crispin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

I OBJECT to Policy A43 (400 houses & 7000 sq metres of industrial space at Garlick’s Arch).
The site includes ancient woodland which must NOT be encroached upon by any extent.
Additional traffic and noise will severely and adversely destroy the Green buffer between the A3 and Send.
Adoption of this policy and will set a precedent for further development along the A3 corridor between M25 and Guildford.
All traffic into and out of this site will route through Send’s already busy roads, and industrial area will generate unacceptable levels of heavy vehicle traffic.
Send must NOT become a Local Rural Centre.
The site must NOT be developed and the Policy must be abandoned

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

Attached documents:

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<th>Respondent: 11007713 / Grahame Crispin</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

Adopting this policy will generate unacceptable additional local traffic and heavy vehicles through Send and its already poor road network, by attracting traffic to/from Woking and surrounding areas from other routes.
The existing A3 restricted entry/exit junctions at Ockham, Burnt Common and Burpham are perfectly adequate for the current local communities, and the restrictions are extremely beneficial in minimising traffic for the villages.
If the policy were adopted, the provision of additional slip roads would also spawn demand for further as-yet unplanned development which would further increase unacceptable traffic pressure through Send and its environs; Send will become gridlocked, and noise and pollution levels become unacceptable.
Send must NOT become a Local Rural Centre.
The additional slip-roads must NOT be developed and the Policy must be abandoned.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3192  Respondent: 11007713 / Grahame Crispin  Agent:

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

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

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

I OBJECT to the validity of Guildford Borough Council’s evidence base used to demonstrate a need for the above Policies being objected to (namely P2, A42, A43, A43a, A44).

Required Employment space versus 2015 ELNA & 2013 ELNA has been overstated.

Housing needs (2015 SHMA) have been overstated by including, for example, foreign students.

The number of houses that is suggested as being required has been exaggerated by GBC; a more realistic lower requirement could be satisfied by the re-use of brown-field sites, and Green Belt land does not need to be encroached into.

At the time it was voted upon (24/5/16), Guildford Borough Council’s Local Plan did not take account of Guildford Borough Council’s Transport Assessment (not available until weeks afterwards on 6/6/16).

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

Attached documents:

Comment ID: SQLP16/1064  Respondent: 11007713 / Grahame Crispin  Agent:

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

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

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

I OBJECT to Guildford Borough Council not having followed correct process in relation to the above Policies being objected to (namely P2, A42, A43, A43a, A44).

The significant changes to the GBC Local Plan in relation to Send from 2014 until now July 2016 mean that a full consultation must be undertaken under Regulation 18, and not the ‘short-cut’ Regulation 19 process currently being attempted by GBC.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3840  Respondent: 11008001 / Steven Crooke  Agent:

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

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

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

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

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

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

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

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

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

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

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

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

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

Attached documents:
Comment ID: PSLPP16/44  Respondent: 11008033 / Sandra Reeves  Agent:

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

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

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

I object to Send being removed from the Green Belt with vulnerable areas of land being proposed to be taken out of the Green Belt including the land behind the school including the playing fields and woodland, the land to the right of Cartbridge by the River Wey Navigation and the land left of Cartbridge going up to the old depot on the Wey Navigation.

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

Attached documents:

Comment ID: SQLP16/94  Respondent: 11008033 / Sandra Reeves  Agent:

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

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

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

I object as Guildford BC has failed to provide sound evidence in terms of the Employment Land Needs Assessment 2015 (ELNA) This showed that the industrial space at Burn Common is no longer needed. That 13860 new houses are required is also an exaggerated figure. The Green Belt does not need to be built on and 50% of new homes needed could be built instead on brownfield sites. GBC’s Transport Assessment was not available to councillors for he vote on 24th May whilst infrastructure overload has received little attention.

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

Attached documents:

Comment ID: SQLP16/95  Respondent: 11008033 / Sandra Reeves  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)
I object in that Guildford BC has not followed the correct process having changed every major site in Send proposed for development since 2014, now adding in a major new road junction. The proposal for new houses has changed having done down in April 2016 to 185 and now being increased to 485. Significant changes require another full consultation under Regulation 18.

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

Attached documents:

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I object to the Policy A42 change at Clockbarn in Tannery Lane because this increase from 45 to 60 homes is far too much and ignores the hundreds of prior objections made by local people against this planned development. It will lead to further traffic problems already experienced at the Tannery Lane and A247 junction and will make surface water flooding even worse. Importantly it will erode the Green Belt in our village.

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

Attached documents:

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I object to the Policy A43 change at Garlick's Arch as it again completely ignores the thousands of previous objections made by local people. I feel very strongly that this will cause over-development of our village with an excessive number of houses which will destroy ancient woodland, which is permanent Green Belt land where no "exceptional circumstances" exist. As well, it will generate excessive traffic which existing local roads in Send and Ripley will not be able to cope with. We already have frequent traffic chaos from traffic using the village as a cut through from the A3. The proposed development will also join up Ripley and Send and defeat the key purpose of Green Belt. I also object to the siting of Travelling showpeople on this site when there has been no proven demand at this location.

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

Attached documents:
I object to Policy A58 at Burnt Common because it had been deleted from the 2014 draft plan because of all the objections previously made. In particular I object to the word "minimum" changing from the previous word "maximum" particularly since then there has been a decline in the demand for industrial land. There is no proven need for local industrial or warehouse development on Green belt land when both Slyfield and Guildford have empty sites and industrial units. The impact that such a development would have on the village is substantial and would create traffic gridlock, as well as joining up the existing villages and defeating the purpose of the Green Belt.

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

Attached documents:

The scale and pace of the proposed development in the draft Local Plan will forever change the rural nature of Send. The lack of infrastructure within Send/ Send Marsh/ Burnt Common and proximity to sensitive areas of nature means Send is not suitable for the changes proposed in the draft Local Plan.

As a mother of three children I choose to live in Send as I felt it would provide my children with a great place in which to grow up, however these proposals threaten to destroy all that is good about the village. It will lose its identity as a rural village and simply become a congested suburb. Already the roads are busy and with the scale of development proposed I feel there is not the infrastructure to cope with more traffic and more housing.

Already the doctor’s surgery is very busy and it is difficult to get an appointment and the schools are over-subscribed. I want to feel safe crossing roads with my children without the worry of further traffic speeding along the local roads.

This local plan is what the developers want and is certainly not what local residents such as myself want for Send. I very much hope that you will take these concerns into consideration.

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

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

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

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

1. I OBJECT to the proposed Infrastructure Schedule (Appendix C)

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

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

Attached documents:

Comment ID: PSLPA16/1101  Respondent: 11008225 / Russell Pascoe  Agent:

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

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPS16/1832  Respondent: 11008225 / Russell Pascoe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25
**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.
Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

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

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

Attached documents:

Comment ID: PSLPS16/1833  Respondent: 11008225 / Russell Pascoe  Agent: 

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

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

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

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

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

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

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

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

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

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)
It is clear that with this site being added at the 11th hour no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

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

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

**Attached documents:**

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<th>Respondent: 11008225 / Russell Pascoe</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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1. I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

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

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

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

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

**Attached documents:**

<table>
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<th>Comment ID: PSLPP16/3968</th>
<th>Respondent: 11008225 / Russell Pascoe</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
1. I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

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

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

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

Attached documents:

Comment ID: PSLPP16/3963  Respondent: 11008225 / Russell Pascoe  Agent:

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

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPP16/3964  Respondent: 11008225 / Russell Pascoe  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ( )
1. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

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

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

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

Attached documents:

Comment ID: PSLPP16/3966  Respondent: 11008225 / Russell Pascoe  Agent:

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

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3975  Respondent: 11008225 / Russell Pascoe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3972  Respondent: 11008225 / Russell Pascoe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.
Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLP16/3974  Respondent: 11008225 / Russell Pascoe  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3 – Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLP16/3969  Respondent: 11008225 / Russell Pascoe  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **I OBJECT**, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

1. **I OBJECT** to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Comment ID: PSLPP16/3970  Respondent: 11008225 / Russell Pascoe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3971  Respondent: 11008225 / Russell Pascoe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3959  Respondent: 11008225 / Russell Pascoe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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<tr>
<th>1. I OBJECT to not protecting the Green Belt (Policy P2)</th>
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<tr>
<td>I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.</td>
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<td>There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt &amp; Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.</td>
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<td>Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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<th>1. I OBJECT to development in areas which are at risk of flooding (Policy P4)</th>
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<td>National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.</td>
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<tr>
<td>The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.</td>
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<td>The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the...</td>
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flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3957  Respondent: 11008225 / Russell Pascoe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

bjections to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3958  Respondent: 11008225 / Russell Pascoe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Borough Wide Strategy (Policy S2)

a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the proposal to inset Send Business Park from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2438  Respondent: 11008417 / Sara Thorne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

I am writing to raise my OBJECTIONS to the Guildford Draft Local Plan.

I OBJECT to Send Village being removed from the Green Belt. There is no requirement or justification for this. The Green Belt, as required by the National Planning Policy Framework, was intended to be permanent and there are no special circumstances (and none provided) to justify abandoning it. The plan will irreparably damage the nature and character of Send Village and Send Marsh - this is very much "the thin end of the wedge" and in removing Send's Green Belt the plan is essentially removing Send as a Green Belt buffer between Guildford and Woking. Roads that are already congested will become more congested still and more dangerous, local services already strained will break and the character of the place where we (not the planners, not the developers) live will be fundamentally altered with no reasonable cause.

I OBJECT to the consequences of the draft plan insofar as they affect Send which are plain to see. Any problem within wide radius (traffic accidents, roadworks, flooding for example) lead to the main road quickly becoming gridlocked in either or both directions. The new houses, industrial development and A3 interchange will make this a permanent state of affairs. These are roads that people live on and alongside pavements where children walk to school - the effect of these proposals will be to create these as commercial thoroughfares inappropriate for the community.

I OBJECT to building 45 houses at Clockbarn Nursery. Tannery Lane is far too twisted and narrow to take any more traffic - with the already-increasing amount of traffic along Tannery Lane and Send Road, the junction between these two roads is already very dangerous. With the prospect of more to come from already-approved planning permissions. Tannery Lane
cannot take any more volume. I OBJECT to building 400 houses and 7,000 sq meters in industrial space at Garlick's Arch. There is no justification for this - it is an inappropriate location with the single access provides insufficient access. The site floods and is covered by ancient woodland - there are existing brownfields sites (e.g. Slyfield) more appropriate for any such development if indeed it is needed. The local infrastructure cannot take the additional strain on services and the roads cannot take the increased commercial traffic that would result. The fact that that this proposal was only included at the last minute - effectively removing Send from the Green Belt altogether - smacks at best of ill-planning and "making it up as we go along" and at worst of something more sinister.

I OBJECT to the new interchange with the A3 at Burnt Common. As a consequence, Send would have to take traffic from the proposed new housing developments in the locality, much to this traffic to and from the A3, M25, Woking and Guildford. As noted above, the Send Road - often gridlocked already- will be permanently overloaded and there will be an inevitable over-spill into Send Marsh and Potters Lane which will be in danger of becoming rat-runs and busy alternatives. These are roads that people live on and along which children walk and cycle to school. The proposals will make for a dangerous cocktail for no good reason.

I OBJECT to the development of 40 houses and 2 travellers' pitches at Send Hill. There is no justification for all the additional housing that is being proposed and as far as I am aware no explanation has been provided. Again this is an inappropriate location because of the narrow width single access providing insufficient access. Any development would spoil this area set in beautiful countryside and furthermore the subsoil of the proposed site contains documents unsafe landfill waste registered with you, Guildford Borough Council.

I OBJECT because Guildford Borough Council have not followed the correct process. Since 2014 the Council has changes every major site in Send proposed for development and now not only increased again the proposal for new houses to 485 but also added a la-e and character-changing road junction. Surely there should be another full consultation under Regulation 187. Indeed, the major proposed development at Garlick's Arch (Policy A 43) is new and has not been consulted upon previously. It gives little confidence that due process is being followed as the ramifications of this proposal for the community of Send cannot be under-estimated.

I OBJECT to the draft local plan for the reasons given above. The disregard for the Green Belt, for the local community and for the consequences to these of the draft plan make it inappropriate and illconceived.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID:</th>
<th>PSLPA16/3716</th>
<th>Respondent:</th>
<th>11008417 / Sara Thorne</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
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I OBJECT to Send Village being removed from the Green Belt. There is no requirement or justification for this. The Green Belt, as required by the National Planning Policy Framework, was intended to be permanent and there are no special circumstances (and none provided) to justify abandoning it. The plan will irreparably damage the nature and character of Send Village and Send Marsh – this is very much “the thin end of the wedge” and in removing Send’s Green Belt the plan is essentially removing Send as a Green Belt buffer between Guildford and Woking. Roads that are already congested will become more congested still and more dangerous, local services already strained will break and the character of the place where we (not the planners, not the developers) live will be fundamentally altered with no reasonable cause.
I OBJECT to the consequences of the draft plan insofar as they affect Send which are plain to see. Any problem within wide radius (traffic accidents, roadworks, flooding for example) lead to the main road quickly becoming gridlocked in either or both directions. The new houses, industrial development and A3 interchange will make this a permanent state of affairs. These are roads that people live on and alongside pavements where children walk to school – the effect of these proposals will be to create these as commercial thoroughfares inappropriate for the community.

I OBJECT to building 45 houses at Clockbarn Nursery. Tannery Lane is far too twisted and narrow to take any more traffic – with the already-increasing amount of traffic along Tannery Lane and Send Road, the junction between these two roads is already very dangerous. With the prospect of more to come from already-approved planning permissions. Tannery Lane cannot take any more volume.

I OBJECT to building 400 houses and 7,000 sq meters in industrial space at Garlick’s Arch. There is no justification for this – it is an inappropriate location with the single access provides insufficient access. The site floods and is covered by ancient woodland – there are existing brownfields sites (e.g. Slyfield) more appropriate for any such development if indeed it is needed. The local infrastructure cannot take the additional strain on services and the roads cannot take the increased commercial traffic that would result. The fact that that this proposal was only included at the last minute – effectively removing Send from the Green Belt altogether – smacks at best of ill-planning and “making it up as we go along” and at worst of something more sinister.

I OBJECT to the new interchange with the A3 at Burnt Common. As a consequence, Send would have to take traffic from the proposed new housing developments in the locality, much to this traffic to and from the A3, M25, Woking and Guildford. As noted above, the Send Road – often gridlocked already – will be permanently overloaded and there will be an inevitable over-spill into Send Marsh and Potters Lane which will be in danger of becoming rat-runs and busy alternatives. These are roads that people live on and along which children walk and cycle to school. The proposals will make for a dangerous cocktail for no good reason.

I OBJECT to the development of 40 houses and 2 travellers’ pitches at Send Hill. There is no justification for all the additional housing that is being proposed and as far as I am aware no explanation has been provided. Again this is an inappropriate location because of the narrow width single access road providing insufficient access. Any development would spoil this are set in beautiful countryside and furthermore the subsoil of the proposed site contains documents unsafe landfill waste registered with you, Guildford Borough Council.

I OBJECT because Guildford Borough Council have not followed the correct process. Since 2014 the Council has changes every major site in Send proposed for development and now not only increased again the proposal for new houses to 485 but also added a large and character-changing road junction. Surely there should be another full consultation under Regulation 18? Indeed, the major proposed development at Garlick’s Arch (Policy A 43) is new and has not been consulted upon previously. It gives little confidence that due process is being followed as the ramifications of this proposal for the community of Send cannot be under-estimated.

I OBJECT to the draft local plan for the reasons given above. The disregard for the Green Belt, for the local community and for the consequences to these of the draft plan make it inappropriate and ill-conceived.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I strongly support the policy to retain this allotment space. Allotments are essential community havens that promote mental and physical wellbeing as well as presenting a far nicer environment for the community. Losing this space will be another step in a move toward an unhealthy and insular community that doesn't enjoy fresh air, or interactions with their neighbours. Indeed many take a lot of enjoyment in sharing the produce their allotments produce with their friends and neighbours or indeed the elderly or those in need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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Answer (if comment is on questions 1-7 of the questionnaire): ()

I object. I regularly use this car park for short visits to Guildford high street. The development of 60 homes (presumably flats) is a large number for such a small site and as a result the statement "Retain as much public car parking as possible" in no way guarantees a meaningful area of parking will actually be retained.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1153  Respondent: 11008737 / Louise Whitbread  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object. As a local resident I object on the grounds of strain on the local infrastructure in relation to the roads (this proposed development is off a small lane and the junction with Send Road is already difficult with existing traffic), doctor surgery & local schools.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1154  Respondent: 11008737 / Louise Whitbread  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object. As a local resident I object on the grounds that 400 homes & substantial industrial building will put significant strain on the local infrastructure particularly the already busy roads and in terms of the homes strain on the doctor surgery & local schools with no outlined plan to mitigate the risk. The requirements to pay "significant regard to the ancient woodland within the site" does not guarantee all said woodland will be protected and preserved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I have attended a presentation at East Horsley Village hall and discussed the impact of the local plan with several of your officers who were there. The only amendments to the rejected Wisley airfield project was a slight expansion of the area with no increase in additional housing To which I strongly object.

The other development issues in the local plan are still the same as before. You want to cram houses into some fields (533 I counted) in East and West Horsley, plus 2200 at Wisley and Ripley is under siege as well. I have protested in the past, but as this is a theoretical amendment, I am objecting again. Sites 38, 39, 40, and 41 are unsuitable. The village is small and the roads are narrow. The required lorry and construction traffic will jam the entire area for years and once it is completed will overwhelm the local facilities. You cannot get a doctor’s appointment for several days at the moment and another 1500 residents certainly won’t help and that’s without the Wisley Development. Local schools are already under pressure and Secondary schools particularly. There is no provision for road improvement in Horsley.

The Ockham Road North development by the railway bridge will put hundreds more cars a day onto a difficult road, with narrow pavements, single file in places and significantly increase the risk of a pedestrian being struck by a passing car or lorry wing mirror. The road also floods easily and regardless of flood risk controls in building, the water will continue to fall and has to go somewhere. You can’t just keep adding to a 1930’s infrastructure. The whole thing needs to be re thought if you are doing something like this. I did note that none of the Council representatives live in the area!!!

The other 2 proposals in West Horsley are also overkill. You may have noticed that there is a stop and go bit of road where it is too narrow for cars to pass and only one lane can go at a time. East Street is certainly not suitable for an increase in traffic of this magnitude.

The final proposal in Ockham Road North is at least a bit further out, but still adds a significant volume of traffic to an already over busy road. I have live there for 27 years and the traffic increase is amazing in that time. It frequently takes several minutes to get out of my driveway and of course there is the mother’s jam at Raleigh and Glenesk schools.

In addition I have repeated the very well thought out objection to the Wisley Airfield below and there is nothing significant in the new plan which changes that situation

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to OBJECT to Amended planning application 15/P/00012 for the following reasons:

**Sustainability:** The site is remote and occupants will rely on the use of the private motor car adding to traffic congestion on both the Strategic Route Network (the A3 and the M25) and local roads which are already running over capacity.

- The application relies on people switching to walking, cycling and public transport. This is unrealistic as it is two miles to the nearest railway station and at least half the route has no footpath. Roads are narrow and unlit.
- There is no spare parking capacity at either of the local stations.
- Sites of this size are required to provide outdoor open space. The applicant has “double counted” the outdoor space with that required for SANGS.
- The loss of high quality agricultural land is in contravention of policy.

**Air quality:** The air quality figures are based on an unreliable transport assessment.

- The applicant has not used the DEFRA modelling statistics as required and rather appears used numbers from an unrecognised (and unreliable source).
- Poor air quality is exacerbated in the area by temperature inversions which trap the air. Young and old are extremely susceptible to poor air quality.
- Air quality is not improving as fast as expected, partly due to the excessive emissions (VW et al).
- The impact of poor air quality on RHS Gardens at Wisley and the Thames Basin Heath Special Protection Area (SPA) is already in excess of legal limits.

**Transport:** The transport assessment makes a number of erroneous assumptions and is not credible.

- It is completely unrealistic to assume that there will be a decrease in vehicle movements.
- There is no impact on traffic for the recently added secondary school, nor from the fact that prior to the school being built the children will have to be transported to the nearest available school in Leatherhead – adding to congestion.
- There appears to be no impact shown for the 270 daily bus movements or for the waste lorries or HGV deliveries to the site.
- The TRICS data used for comparison is not a relevant measure: site not comparable with a site in Guildford, nor a site 400m from the centre of Redhill, nor one on the edge of Staines.
- The traffic counts bear no relation whatsoever with counts submitted to Guildford or to Woking borough councils in support of other large development projects.
- The modelling in the Transport Assessment at 7 junctions close to the site bear no relationship to the daily experience of residents, evidencing flawed modelling.
- The number of daily trips is understated in the region of 1000 vehicle movements.
- Additional traffic will have a negative impact and cause irreparable damage to historic houses and other buildings in Ockham/ Ripley/Downside and further afield.
- If allowed, the impact of the additional traffic may prohibit other developments further south on the A3 or indeed those needed by the RHS.

**Appropriate development:** The site is in the Green Belt in a rural location, hemmed in by the A3 to the west, the TBHSPA and the M25 to the north and the Conservation area of Ockham Village to the south.

- Green Belt boundaries can only be changed in the local plan process and in exceptional circumstances which have not been demonstrated.
- The site is not big enough to provide satisfactory living standards even for “affordable housing”.
- Four and five storey buildings are not appropriate in the rural environment nor on an elevated site.
• Residents will be crammed in with little outdoor space, a noisy location, with very poor air quality. The density of housing proposed is similar to that in Islington.

• The site is clearly visible from the Surrey Hills AONB and as a result it will have a negative impact on views to and from the AONB.

**Thames Basin Heath SPA/SSSI/SNCI**: The impact of 2,068 houses on the environmentally sensitive TBHSPA cannot be mitigated. Damage will occur to the habitats of the protected and endangered rare species (including skylarks, nightjars and many others on the RSPB red list) in contravention of the EU Birds Directives and Habitats Regulations

• The siting of the proposed Suitable Alternative Natural Green Space (SANG) adjacent to the SPA will only increase visitor numbers causing further damage

• Part of the SANG is in a designated flood plain

• Para 119 of the NPPF “presumption in favour of sustainable development” does not apply where development requires assessment under the Birds or Habitat Directives

• It is impossible to state without doubt that the mitigation proposed will prevent damage to the SPA particularly in the light of inadequate traffic/air quality reports.

• There are likely to be over 700 dogs and 700 cats living on the proposed development. These will be a constant threat to ground nesting birds on the SPA and cannot be mitigated by one warden working a normal working day.

**Impact on the local area**: The additional 5,000 residents is the equivalent of almost doubling the population of East and West Horsley combined. This increase in local population will impact:

• Light pollution, noise, traffic and infrastructure which has been gravely underestimated and proposed mitigation measures are totally inadequate

• The cumulative development in the borough and in the neighbouring boroughs of Woking, Waverley and Elmbridge per the objections from both Elmbridge Borough Council and Woking B C

• The water table and flooding in the area. It appears that no impact assessment has been done relating to the loss of agricultural land which currently soaks up a significant volume of rainwater.

• Listed buildings adjacent to it such as Yarne, Bridge End House and Upton Farm

• Via closure of a number of local roads coupled with an increase in traffic will affect a large number of road users from Cranleigh to Cobham and everywhere in between

**Inaccuracy of the documentation**: There are factual errors in the documentation

• Highways England have recommended that the proposal cannot be determined due to the applicants failure to provide traffic data in the format required

• There are a number of misrepresentations in the paperwork e.g. nine stations within 5 miles – this is however “as the crow” flies – only Horsley and Effingham Junction are within 5 miles by usable road from the middle of the development

• The applicant’s description of the site as brownfield is a gross over-simplification. 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remaining runway, a habitat for rare flora and fauna, (14ha) has never had buildings. The remainder of the site (55%) is high quality agricultural land.

**Other**: This site is not deliverable within 5 years due to problems with sewerage and water capacity, outlined by Thames Water & the OCK DVOR air traffic control beacon which limits development until 2022

• No very special or exceptional circumstances exist - Alternative sites exist

• The proposal includes the site SCC safeguarded for waste under the Surrey Waste Plan

• The site is not listed for development under the existing 2003 Local Plan

• There is not enough land to provide a sustainable community based on GBC’s own parameters

• There is no update at all to the Heritage study despite the significant Bronze Age haul found in Ockham village in May 2013 and the likelihood of further remains on the site.

I trust the Council will find this useful, in their deliberations
Population growth

I have major concerns in relation to the assumed population growth and by extension the 13,860 new homes this suggests are required. Firstly, the numbers are based on pre-Brexit projections for economic and population growth. There is a strong likelihood that these numbers should now be revised downwards.

It is utterly irrational to embark on a radical transformation of the borough without a clear Housing Target. The actual figure of 13,860 new homes is unsubstantiated and has not been scrutinised by Councillors despite repeated requests for debate. Equally unsound is the fact that the assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. The fact that this contractor is used by a number of local authorities should not be used as confirmation of the veracity of the figures, and the complete lack of transparency concerning these projections is quite frankly shameful. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. Yet we are prepared to change forever the face of our county on this basis? I therefore object to the Local Plan based on

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Specific Sites in Local Plan

As an East Horsley resident:-

- I am not opposed to development of Site A36 and Site A37. I believe these are supportable development sites.
- I am opposed to development of Site A39 as the site is currently in the Green Belt and in a flood zone area.

I am opposed to development of Site A38, A40 and A41 as all three currently sit in the Green Belt and will completely swamp West Horsley village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8052  Respondent: 11009057 / Lucy Fairley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am strongly opposed to development of Site A35, former Wisley airfield. This site is a large area of current Green Belt which provides protected open space near the M25 and is a barrier to outward development from London. Creating this new settlement would cause irrevocable harm to the Green Belt and environment. It would also overwhelm local roads (from a traffic perspective) and local facilities/services (shops, health centre, railway services, schools). I am appalled at the inclusion of this site within the Local Plan as it was subject to a recent planning application (15/P/00012) which was unanimously rejected by the Planning Committee.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/17871  Respondent: 11009057 / Lucy Fairley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
**Designation of East Horsley as a District Shopping Centre**

The Local Plan designates East Horsley as a “District Shopping Centre”. This is extraordinary given that East Horsley houses a small collection of shops (convenience store, hairdresser, butcher, bank, pharmacy) typical of a medium sized village centre. The facilities are not in any way those of a main town centre, or urban area, from the perspective of either retail (there is no supermarket), leisure, office or arts/culture facilities. I object strongly to East Horsley being designated as a District Shopping Centre – it should be classified as a Local Centre.

Furthermore the local facilities and infrastructure would be completely overwhelmed by the scale of the proposed developments in East Horsley, West Horsley and the former Wisley airfield site. In particular the road infrastructure, East Horsley shops, health services, schooling and train transport – many of these are already stretched and in some cases inadequate for the current residential community. I see no suitable sustainable proposals on supporting infrastructure investment outlined in the Local Plan to justify the proposed level of development and therefore object to these proposed developments.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/17870  **Respondent:** 11009057 / Lucy Fairley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I wish to register objections to the Local Plan on a number of counts.

**Green Belt**

The National Planning Policy Framework states that the Government attaches great importance to the Green Belts; the fundamental aim of which is to prevent urban sprawl by keeping land permanently open. I strongly object to the changes to the Green Belt which are proposed and specifically to the exclusion from the Green Belt of the former Wisley airfield site and ‘insetting’ of East Horsley, West Horsley and Effingham villages.

I find the arguments proposed in 4.3.12, 4.3.14 & 4.3.16 of the Local Plan to be fundamentally unsound. I cannot see any justification for the former Wisley airfield site to be excluded from the Green Belt and I consider the ‘insetting’ of East Horsley, West Horsley and Effingham villages to be unacceptable. I consider both these proposals to be against the National Planning Policy Framework which states “once established Green Belt boundaries should only be altered in exceptional circumstances”. The status quo for the former Wisley airfield site and for these villages is that they currently are in the Green Belt. Ministerial Guidance on the Green Belt makes it clear that legally unmet housing need alone is unlikely to qualify as “exceptional circumstances”. I firmly believe the former Wisley airfield site and East Horsley, West Horsley and Effingham villages should continue to lie within the existing Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/3297  **Respondent:** 11009057 / Lucy Fairley  **Agent:**
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<td>I am opposed to development of Site A35: 2,000 homes on Fomer Wisley Airfield, Ockham. Creating this new settlement would cause irrevocable harm to the Green Belt. It would also overwhelm local roads and local facilities/services.</td>
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<td>The Local Plan amendments clarify definitions which in my view confirm that Station Parade, East Horsley should not be designated as a “District Centre”. Neither should this be designated as a “Strategic Employment Centre. East Horsley is a small collection of shops (convenience store, hairdresser, butcher, bank, pharmacy) typical of a medium sized village centre and should more appropriately be designated a “rural local centre”. The facilities are not in any way those of a main town centre, or urban area, from the perspective of either retail (there is no supermarket), employment, leisure, office or arts/culture facilities.</td>
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<td>These local facilities and infrastructure would be completely overwhelmed by the scale of the proposed developments in East Horsley, West Horsley and in particular, Wisley Airfield/Ockham. The road infrastructure, East Horsley shops, health services, schooling and train transport are already stretched and in some cases already inadequate for the current residential community.</td>
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I wholeheartedly disagree with the statement “The Metropolitan Green Belt will continue to be protected, as shown designated on the proposals”. Given the changes to the Green Belt which are proposed, I cannot see how Guildford Borough Council can claim to be championing the Green Belt in any way, much to my dismay. I firmly believe East Horsley, West Horsley and Wisley Airfield should continue to lie within the existing Green Belt.

The NPPF states that the Government attaches great importance to the Green Belts; the fundamental aim of which is to prevent urban sprawl by keeping land permanently open - "once established Green Belt boundaries should only be altered in exceptional circumstances". The status quo for West Horsley and East Horsley is that they are currently in the Green Belt. Ministerial Guidance on the Green Belt makes it clear that legally unmet housing need alone does not qualify as “exceptional circumstances”.

I object to the creation of a new settlement at Wisley Airfield as outlined in the Spatial Vision and its inclusion as a “strategic development site” in 4.1.9. The NPPF states that sustainable development means achieving growth while “ensuring that better lives for ourselves don’t mean worse lives for future generations”. The area around Ockham is beautiful countryside and important farmland. To develop this area would be absolute desecration and destruction of the NPPF principles, resulting in the loss forever of this rural landscape and more importantly the wildlife and plant habitats. It is not a sustainable location given the lack of amenities and transport – Ockham is a small settlement with no infrastructure. I do accept the need for further housing but it MUST be development of brownfield sites within developed areas. (We do not have an infinite number of natural habitats left in the overdeveloped South East to destroy with impunity!

Policy P2 of the Local Plan clearly states “We will continue to be protected the Metropolitan Green Belt, as shown designated on the proposals Policies Map, against inappropriate development. In accordance with national planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.” The Local Plan’s proposal to include the Former Wisley Airfield as a potential development site is completely contrary to this statement and I object strongly to such a large scale expansion into the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attended documents:

Comment ID: PSLPA16/4250  Respondent: 11009121 / William Bagnall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Guildford Urban Area

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I refer to the submission we made last Nov – a copy of which is attached for ease of reference. We have had no response to the points raised and having looked at the latest draft local Plan issued for consultation we can see no evidence that there has been any coherent integrated plan for traffic in the area in conjunction with Surrey County Council and in particular proposals to ease both traffic flow and traffic impact on residents of Compton. Without such plans we consider it inappropriate to proceed with large scale additional housing development in the area.

*******************************************************************************NOV 2015
We have registered on the MasterPLan consultation website but the questionnaire isn’t really designed to record our the feedback on specific aspects of traffic and infrastructure, so please accept this as our contribution to the public consultation process.

We have looked at the Guildford Town Centre Masterplan and welcome the general aims of enhancing the provision of commercial and residential accommodation to meet future changing needs, to substantially improve the linkage and use of the area between the town centre, the station and the river and to overcome the traffic problems. It is a much needed plan to ensure the ongoing success of this wonderful town.

Our one major concern is that all the extensive studies to alleviate the very difficult traffic problems, concentrate on the impact within the town and there is no assessment of, or weighting to, the consequential impact of each option in the surrounding area. We may be mistaken but we cannot find how these proposals fit within a plan for the wider area that addresses both traffic flow and traffic impact on residents and users of that area – as you have rightly done for the Guildford centre.

If the current preferred options for the Guildford Masterplan are adopted, through traffic will have to find alternative routes. For east/west traffic we believe this will mean yet further traffic flows along the B3000 which is the principal east/west route south of Guildford for vehicles with end destinations in Godalming, Guildford and areas to the east or west of Guildford. This is a truly frightful prospect for the village of Compton.

Compton is part of your Borough and is also your responsibility. It is far smaller than Guildford but is another precious asset of the Borough with its many listed buildings, historic church, Loseley Park, Watts Gallery and its setting in the beautiful Surrey Hills. Yet it feels that the huge damage to the village caused by the massive increase in traffic in the last 30 years is never addressed by local or county government – we suspect it just ends up on the “too difficult” pile.

The statistics are well known and recorded through the two VAS speed alert units. In the region of 6 million vehicle movements a year – one every 2.4 secs during rush hour – through a rural village! The 30 mph speed restriction is almost universally ignored except when the weight of traffic forces it or we are doing a community staffed Speedwatch session. Top speeds through the village are consistently recorded at over 50 mph.

The sum total of government help for the village over 30 years has been the laying of quiet road surface in part of the village which was then ripped up a few years later and the absurd installation of rumble bars right outside cottages in New Pond Road which had to be removed at considerable expense. The parish paid for the vehicle activated speed warning signs and data collection box.

Population levels in SE of England are estimated to increase and levels of traffic are not going to reduce. Basing a Guildford solution on an assumption that changes in modes of travel will result in a major traffic flow reduction feels illusory. In deciding on the Guildford Masterplan please do so together with a coherent integrated plan for traffic in a much wider area in conjunction with Surrey County Council. If the best long term solution is a major infrastructure project for this area of the SE, please do not discard it on the grounds of cost- rather why not present it to the new National Infrastructure Commission? Andrew Adonis has a proven track record in delivering long term education and transport projects where he can see the benefits and there must be a great case for helping Guildford and area to further build on its success as a key town in the south east whilst easing the traffic impact on villages.

It would be appreciated if you could acknowledge receipt of our consultation response.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that GBC have failed to provide sound evidence in terms of the Employment Land Needs assessment which shows that industrial space at Burnt Common is no longer needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2349  Respondent: 11009281 / David Foot  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In the earlier drafts of the Plan, no options were presented on this proposal and you appear to have ignored the huge number of objections made on this matter at the earlier stages of this consultation. The character of the East and West Horsley villages as it exists today is a direct consequence of the protection afforded by their Green Belt status for more than 50 years. Generations of central government and local authority officials and politicians have respected this highly successful post-war planning policy mechanism. Its existence has not prevented organic development of the villages over the years, but has enabled this development to take place in a controlled way. It is surely not beyond the imagination of your Council to make proposals for continued organic development of the villages by appropriate provisions and shaping of policies within the Green Belt rules.

I object to the introduction of a new planning designation that would allow "limited infilling" within an extensive area to the south of the A246 in East Horsley. This might have been acceptable in the context of a more imaginative approach to planning (see comment above) but if you are determined to remove the Green Belt status of the village, then it makes no sense to pick away at the edges.

In the context of the above, you will not be surprised to hear that I also object to the Sites Policies set out in the Local Plan, more particularly in respect of the numbers of houses envisaged for building on each site. If the Green Belt designation of the two villages is to be removed, then all the sites listed for the two villages will have an inappropriately high density of housing, not consistent with the existing character of the villages. To take one example, the proposal to put 48 houses on the Thatcher's hotel site is far too high a density, being more than twice that of adjoining housing. Furthermore, this site is currently occupied by a busy hotel that brings many visitors to the village. This is our only hotel in East Horsley. How can it be consistent with your Economic policy to remove our one and only healthy hotel business? I object to the inclusion of the Thatcher's Hotel site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4479  Respondent: 11009281 / David Foot  Agent:
I also object to the proposal to build houses on the former Wisley Airfield. When this site was the subject of a planning application, it was refused by your Councillors without reservations. Well done! So why has it been restored as a candidate building site in the local Plan? My objection to building at Wisley is for both environmental and infrastructure reasons which were well articulated at the GBC planning hearing, and which have not been subsequently addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Finally, I object to the Plan because of its potential effect on our infrastructure in East and West Horsley. There are several aspects to this-schools, medical facilities, car parking, drainage, access to transport facilities, all are stretched at the moment. I will focus on just one aspect-roads in East Horsley. I live close to the Ockham Road South. This is already far too narrow to allow two lorries to pass without mounting the pavement. Frequently I am forced to drive on the pavement when builders' lorries and pick-ups come in the opposite direction. It is just not good enough to say that this is the responsibility of Surrey County Council. Does Guildford Borough Council not subscribe to a joined-up planning policy? By ignoring the limitations of the existing infrastructure supporting the Village, the Borough Council is planning a serious deterioration of the Quality of life here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I entirely reject the proposal to take the villages of East and West Horsley out of the Metropolitan Green Belt. Your proposed Local Plan claims to protect the Green Belt—not just some of it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp173/263  Respondent: 11009281 / David Foot  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley South

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have commented before on the Council's proposal to take the village of East Horsley out of the Green Belt (what you call insetting) and the very ambiguous statement that the Green Belt is being protected in the proposed Plan. That is clearly not happening, and a more plausible and honest statement of Green Belt policy needs to be stated in your Plan if is still your intention to remove the Green Belt status of this village in the face of many objections. Along with this, you are proposing to increase the area to be "inset" beyond the boundaries of the existing settlement area in order to maximise the area available for building on the fringes of the village. However I wish to comment more specifically on what appears to be a new proposal in your targeted consultation. This is to extend the settlement boundary in East Horsley to the south of the A246. While I am pleased to see this area is not threatened by Green Belt removal, the proposal you are making is difficult to comprehend on the maps - the various Appendix H maps for East Horsley South - and is largely unexplained in the text. It seems to have been 'bounced in' to the Plan at the very last minute. One of the main components of this potentially increased settlement area is Chalk Lane and its environs. The Lane is a scenic and archaeological feature of the village, being an old drove road probably dating from pre-historic times. The proposal to include this sensitive area within the new settlement area boundary will put at risk the unique character of the area. It is very likely to promote unsympathetic mulling and extensions to properties, and new and larger accesses that destroy the chalk banks and degrade the whole character of this part of the village. I therefore strongly object to the movement of the Settlement Area Boundary south of the A246 which is proposed under the various East Horsley South maps in Appendix H which you are proposing as part of Policy P2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2254  Respondent: 11009281 / David Foot  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A36

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
On a more positive note I applaud the Council's proposal to remove site A36 as a potential building site. Plainly the existing hotel on this site is potentially viable - particularly with the arrival of the Grange Park opera - and the advantages of retaining it comprehensively outweigh the very arguable merits of building houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I have commented before on the Council's proposal to take the village of East Horsley out of the Green Belt (what you call insetting) and the very ambiguous statement that the Green Belt is being protected in the proposed Plan. That is clearly not happening, and a more plausible and honest statement of Green Belt policy needs to be stated in your Plan if is still your intention to remove the Green Belt status of this village in the face of many objections. Along with this, you are proposing to increase the area to be "inset" beyond the boundaries of the existing settlement area in order to maximise the area available for building on the fringes of the village. However I wish to comment more specifically on what appears to be a new proposal in your targeted consultation. This is to extend the settlement boundary in East Horsley to the south of the A246. While I am pleased to see this area is not threatened by Green Belt removal, the proposal you are making is difficult to comprehend on the maps - the various Appendix H maps for East Horsley South - and is largely unexplained in the text. It seems to have been 'bounced in' to the Plan at the very last minute. One of the main components of this potentially increased settlement area is Chalk Lane and its environs. The Lane is a scenic and archeological feature of the village, being an old drove road probably dating from pre-historic times. The proposal to include this sensitive area within the new settlement area boundary will put at risk the unique character of the area. It is very likely to promote unsympathetic mulling and extensions to properties, and new and larger accesses that destroy the chalk banks and degrade the whole character of this part of the village. I therefore strongly object to the movement of the Settlement Area Boundary south of the A246 which is proposed under the various East Horsley South maps in Appendix H which you are proposing as part of Policy P2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
I object to the proposed building of 45 houses at Clockbarn Nursery. Tannery Lane already has traffic problems and that is without the additional ones resulting from the proposed planning applications that have been passed. I would imagine that life for the residents would become even more intolerable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3141  Respondent: 11009825 / Sally Baker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to build 400 houses together with 7000 sq metres of industrial buildings at Garlick’s Arch. Many of us in Send live on a flood plain with an archaic drainage system and we do not wish to have this exasperated; Garlick’s Arch is also subject to flooding and is on a higher level. I feel strongly that this is not the area for industrial buildings – this is a village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6835  Respondent: 11009825 / Sally Baker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Once again I am writing to object to the proposed building in the Send area on Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6836  Respondent: 11009825 / Sally Baker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It may well have escaped the attention of the Planning Inspector at Guildford BC that there is insufficient infrastructure in Send to support additional building on this scale. There is already severe traffic congestion, the GP’s in the area are over-stretched and there are problems in a lack of school places. Please draw all this to the attention of the Planning Inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/701  Respondent: 11009825 / Sally Baker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send Marsh/ Burnt Common

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

SEND BUSINESS PARK POLICY 2 AT PARA. 4.3.15

We are back to Tannery Lane and all the problems that ensue together with the development for the Marina, which nobody in Send wanted. Further development in this area would be a disaster. I object to this proposal.

I do wonder how many of you live in Send, travel in Send during the rush hours, try to make a doctor’s appointment in Send and notice how difficult this area is becoming because of the development, and that is without all the proposals listed above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2370  Respondent: 11009825 / Sally Baker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
CLOCKBARN NURSERY POLICY A42

60 homes in this area would be completely inappropriate with the existing access for Tannery Lane. This is an area of Send where congestion is already at a peak and your proposal would mean an addition of another say, 150 cars. We do not have the infrastructure for the addition of all these homes and cars. I object to this proposal.

The idea of increasing the number of houses proposed on this site is ridiculous. As someone who has lived near by for many years and [unreadable word] the traffic problem in Tannery Lane where in places the road is only wide enough to take one car. I think the community who vote [unreadable words] are without any common sense.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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BURNT COMMON POLICY A58

Warehouse development in the middle of a Green Belt area is quite inappropriate when there is room available for rent at Slyfield. The traffic would cause havoc to the minor surrounding roads. I object to this proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/4503  Respondent: 11010081 / Julian Colborne-Baber  Agent:</th>
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West Horsley sites:

With respect to the four sites located in West Horsley:

(i) Policy A37 – Land at and to the rear of Bell & Colvill, Epsom Road, WH (40 homes / 1.4 hectare / 28.6 dwellings per hectare)
(ii) Policy A38 - Land to the west of West Horsley (Manor Farm, between East Lane and Long Reach) (135 homes / 8.4 hectare / 16.1 dwellings per hectare).

(iii) Policy A40 - Land to the north of West Horsley (Waterloo Farm at rear of Ockham Road North) (120 homes / 8 hectare / 15 dwellings per hectare).

(iv) Policy A41 - Land to the south of West Horsley (on East Lane) (90 homes / 4.8 hectare / 18.8 per hectare).

Whilst I am not opposed to new housing in West Horsley per se; the scale of this proposed development in West Horsley is excessive and as set out above not reflecting need in any way. In particular I am most strongly opposed to site A41. This site is critical to West Horsley’s semi-rural identity and character and it is vitally important that this open green aspect is maintained through what is, in so many ways, the centre of the village. Adoption of A41 would enable this open space to become the only development of any significant depth along the whole of the southern side of the East lane / The Street corridor and would severely compromise this ‘green gap’ between the northern and southern parts of West Horsley.

This is contrary to at least two of the five essential purposes of Green Belt as defined at NPPF paragraph 80 (namely to check unrestricted sprawl and to assist in safeguarding the countryside from encroachment – functions which this part of the Green Belt, including this site, is recognised as performing at paragraph 8.2 of the Guildford Green Belt and Countryside Study).

This site had not previously been include as a potential development site within previous draft versions of the emerging Local Plan and assessment of this site, in background studies forming the evidence base for this Site Allocation, is based on incorrect information.

Two key incorrect bases are:

1. In the Guildford Borough Land Availability Assessment (LAA) 2016 – Page 388 in respect of site reference 2063 (‘the site of East Lane’) it states under ‘summary of land designations’ – “Green Belt adjoining settlement boundary”. This is incorrect. Unlike any of the other three sites proposed in West Horsley, this site currently has no boundary that adjoins the village Settlement boundary as defined in the GBC Local Plan 2003.

2. Also, The Guildford Borough Green Belt and Countryside Study produced by Pegasus Planning Group, Volume III – Appendix VI – Sustainability Walking Distance Plans for Land Surrounding the Villages refers to the above site, plus the field beyond that the Council now propose removing from the Green Belt (together with a section of Lollesworth Wood) as site D. All assumed walking paths to (i) Nearest Local Centre, (ii) Healthcare Facility and (iii) Railway Station are presuming that access could have been gained to Lollesworth Lane via the undesignated (save that it has been proposed to be removed from the Green Belt) field to the south and fronting Lollesworth Lane. This field is currently used for grazing sheep and is owned by Mr & Mrs. Richard Wills of Lollesworth Farm and they have advised me and others that they would not permit such access route across their field, therefore the assumption used by Pegasus Planning Group is incorrect and may well have a material effect on their conclusions.

Furthermore, any development on A41 would not be consistent with the distinctive settlement pattern of the village and the important relationship between the built environment and the surrounding landscape (i.e. development on one side of the route only). In my opinion, it will harm important views of the village from surrounding landscape (from Lollesworth Lane) and from within the village of local landmarks (of Lollesworth Wood), contrary to Policy D4 of the Proposed Local Plan.

Allocation of the site will not “promote sustainable patterns of development” and the wildlife / environmental amenity loss of this site is likely to result in a significant detriment to the village’s character. Furthermore it will cause harm to the biodiversity and natural environment of the adjoining Lollesworth Wood SNCI. Indeed, this is contrary to Sustainability Objective 1 of the Sustainability Appraisal framework set out at Table 4.1 of the Guildford Borough Local Plan Sustainability Appraisal.

Policy I4: Green and blue infrastructure; states that “Permission will not be granted for proposals that are likely to materially harm the nature conservation interests of local sites unless clear justification is provided that the need for
development clearly outweighs the impact on biodiversity.” Local Sites are earlier defined in the policy as including Sites of Nature Conservation Importance (SNCI).

Furthermore, there is no reason at all for the amendment to the Greenbelt behind the field beyond site A41 other than to prepare for a potential second phase development in the next Local Plan and surely it cannot be considered to be justified by “exceptional circumstances” when no alternative use is currently proposed and its current and historic use is as pasture?

I strongly object to the alteration of the Greenbelt around A41 and the field beyond and to the inclusion of A41 in the Local Plan.

Across any of the adopted sites in West Horsley, careful consideration must be given to the proposed density of any future developments. The current proposed density is not appropriate for such rural and semi-rural village location and are out of character for the village as it currently largely comprises low density housing, with a considerable mix of ages and housing styles.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18457  Respondent: 11010081 / Julian Colborne-Baber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Infrastructure:

West Horsley does not have any of the infrastructure to support the development proposed. The village is small with few local facilities. There is currently just one shop at the southern end of the village, where local car parking is very limited. Most people in West Horsley already have to travel, largely by car, to East Horsley for their day to day shopping, banking and health needs. The existing car parking facilities in East Horsley are already at capacity and any increase in the local population will add to the already existing problems. Any new development would not “support the continued viability” of the existing village infrastructure, as has been noted by the GBC in the past. Key infrastructure issues include:

- Education that is already under strain;
- The East Horsley Medical Centre is already at capacity and serves both East and West Horsley and some other surrounding villages such as Clandon;
- The utilities infrastructure cannot be further stretched and water pressure is very poor across much of the village already;
- The existing road system is only appropriate for a semi-rural village, many of the roads are little more than lanes and pavements are often only on one side of a carriageway.

Any development will need immediate and considerable investment in infrastructure to support any increase in the village size.

In summary, whilst I accept that some housing development is required across the borough and West Horsley should take its fair share; at present the Local Plan proposes excessive development within West Horsley (in proportion much greater than other locations across the borough) the requirements for which have not been proven in any way. In addition the
current proposals do not support sustainable development of the village and the amendment to the Greenbelt runs contrary to National Planning Policy.

As a result I am strongly opposed to the current Local Plan proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18455  Respondent: 11010081 / Julian Colborne-Baber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Greenbelt:

My first objection to the Local Plan relates to the protection of the Greenbelt. I am absolutely opposed to the removal of some of the village from the Greenbelt through the extension of the settlement boundaries and the insetting. No Exceptional Circumstances or other relevant justification has been demonstrated to justify the new Greenbelt boundary in West Horsley. National planning policy requires that Green Belt boundaries are only amended in exceptional circumstances and that this must be undertaken as part of the Local Plan process. As such the proposal and Policy P2 is not in line with National Planning Guidelines. It is clear to me that it cannot be considered exceptional in order to facilitate the development put forward when a) The Guildford Borough Economic Strategy 2013-2031 makes no case for locating large numbers of homes in West Horsley (or neighbouring villages) (indeed the new economic development sites are located on the other side of the borough to West Horsley) and b) when the current proposals have given insufficient consideration of the use of brownfield sites within the borough (located much nearer centres of employment and supporting infrastructure). This is a key flaw in the Guildford Borough Submission Local Plan 2016 – proposing extensive development in locations remote from areas of employment and supporting infrastructure. The new housing should largely be allocated much nearer and around Guildford’s town and urban areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18456  Respondent: 11010081 / Julian Colborne-Baber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
With respect to the housing need, I do not consider that the case regarding the need for the proposed number of houses in Guildford borough overall has been proven, indeed the target house building programme proposed represents a 25% increase in the housing stock of the borough, whilst we have been advised that the Office of national Statistics (ONS) projects a population increase of some 15% for the borough of Guildford over the same period. With respect to West Horsley specifically the number of new houses needed has not been proven and the Local Plan number for West Horsley is simply excessive. The scale of proposed development (in proportion far greater than other villages within the borough) does not reflect the need and fails to respect the local character and existing building density of the village. I am therefore strongly opposed to the current site allocation and housing densities proposed for all four sites in West Horsley.

Furthermore, in my opinion, the Proposed Submission Local Plan’s proposal to make provision for 62% of this total dwelling requirement on land that is currently Green Belt is not justified. The disproportionate burden of meeting what GBC has chosen to define as its development needs is also proposed to fall on the more rural east of the borough. Within this eastern area, West Horsley is then allocated to bear an excessive proportion of this proposed development, despite the numerous countervailing reasons put forward in previous consultation rounds by many local residents (e.g. narrow roads; areas of flood risk; access to both senior and junior school places; medical facilities, parking availability at the station, etc.) If adopted, the draft plan will put an unsustainable pressure on all local resources and infrastructure.

As I set out earlier on, the Guildford Borough Economic Strategy 2013 – 2031 made no such case for locating large numbers of residential units within West Horsley. I am strongly opposed to the borough housing targets set out in Policy S2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4259  Respondent: 11010145 / Julian Ottaway  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed development at Garlicks Arch. There is no justification in destroying fields and woodland, there is absolutely no justification for adding traffic to an already overburdened road system. You may consider that the Ripley By Pass was constructed to alleviate the traffic in the area. What possible motive is there to completely negate the purpose of the by pass. Every morning the main A3 is blocked from the M25 back to Burpham. Great idea to put 400 houses to add even more traffic that tries to cut through our villages.

The council is elected to represent the views of its residents, not to empire build.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9118  Respondent: 11010145 / Julian Ottaway  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Ref Proposed overdevelopment in Send and surrounds

1. I object to the removal of Send from the Green Belt, it is a village and should not be part of an urban sprawl of Guildford and Woking. The Green Belt was promised as a permanent buffer and both councillors and government have promised to maintain it. Therefore it is the elected councils duty to comply with the promises made to the electorate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/25  Respondent: 11010145 / Julian Ottaway  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy 2 at paragraph 4.3.15

This is a nonsense proposal and not thought out. What was once a business relying on canal transportation should not be considered to be an industrial area and should remain in the green belt.

I have lived in this area for 20+ years and witnessed the gradual insertion of new housing on every available site. If your plan is to be swallowed up by London and become one vast urban sprawl then this will be the result.

Perhaps you should listen and take heed of the residents in this area that pay your wages and not treat us with an arrogance and dismissiveness that is appalling.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/306  Respondent: 11010145 / Julian Ottaway  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to policy A42 because of the impact to the village of increased housing in an area where access is via very narrow country lanes.

The addition of yet more vehicles adding to a road network that can barely cope with the current levels of traffic.

It is also a direct infringement of green belt land

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/307  **Respondent:** 11010145 / Julian Ottaway  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A43

This is an area of fields and woods that is absolute green belt land.

There is no justification for 'travelling showpeople' sites as there is no requirement for 'shows'.

[Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]

[Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]

The road system could not possibly cope with the development.

Most mornings the A3 the Portsmouth Road, Send Marsh Lane are grid locked.

It would be untenable and ridiculous to consider this proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/308  **Respondent:** 11010145 / Julian Ottaway  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to policy A58

Industry requirements for this area are negligible. Introducing heavy goods vehicles and associated employees to this site will exacerbate an already over burdened infrastructure

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1432  Respondent: 11010273 / Dave Brownjohn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A3 Corridor Development

- There is a disproportionate number of new homes and associated development on Gosden Hill Farm, which will significantly and adversely change the appearance and nature of Burpham the area, and the north eastern side of Guildford in its entirety
- The combined developments of Wisley and Gosden Hill Farm represent too large a proportion of the overall Guildford plan developments, bearing in mind that of the proposed 13,860 homes approx. 5,000 homes will be on this side of Guildford (incl about 1,000 homes in Send, Horsley, Burnt Common and Ripley in smaller individual developments)
- There has been no clear justification for the number of 13,860 new homes to be built in Guildford, plus the consequent need of more employment space. How was this figure obtained? Just telling us that independent consultants were employed is not sufficient.

The proposed designation of the employment site on Gosden Hill Farm as a Strategic Employment Site lacks any definitive justification, and will lead to increasing commercial development in future years, and thence to increased stress on the local infrastructure. It will further deteriorate the attraction of the local area to the disadvantage of existing Burpham and Clandon residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3087  Respondent: 11010273 / Dave Brownjohn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Transport

• It is unreasonable to seek approval of a local Plan without clarity on the essential issue of transport and roads infrastructure. The Plan indicates that road improvements will happen, but as some sort of evolving feast as directed by SCC and Highways England. This essential ingredient must be clearly defined for a Plan to be considered properly.

• In particular, the Gosden Hill development and it’s interaction with the A3 is too vague and not realistic. The suggestion of on & off slips to the A3 southbound only is ridiculous, and the alternative proposal by Highways England of a possible multi-direction interchange cannot be left to their discretion and to whether or not some funds can be found (because of course they will not). An integrated A3 multi-direction interchange plan must be part of the developers plan.

• The existing Clay Lane northbound access is just not sufficient, bearing in mind the extra traffic that will be generated by the various proposed housing and commercial developments to the north of the town, as well as Slyfield and Gosden Hill. It should also have some consideration of whether access/egress to Gosden Hill could be via the proposed improved interchange at Burnt Common, avoiding the otherwise inevitable increased congestion in Burpham.

• The potential traffic solution of tunnel must also be integrated with the Burpham development plan, as the Burnt Common to A320 section of the A3 must be the likely start point for such a development.

There are frequent references to the Sustainable Movement Corridor, but no definitive route is proposed. There is 1 small part shown in Appendix C, but no indication of how this will be achieved from Gosden Hill/Burpham to the Town Centre. For instance, presumably Park & Ride buses will just follow the existing London Road into Guildford, adding to the existing congestion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3088  Respondent: 11010273 / Dave Brownjohn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The loss of swathes of the Green Belt is a betrayal of residents (voters) who have moved to the area because of its proximity to protected countryside. We are in danger of creating an “A3 Corridor Conurbation” that could ultimately spread closer and closer to London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/665  Respondent: 11010273 / Dave Brownjohn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents
Other items

Housing and Employment Need - there seems to be an acceptance by GBC of national policy that population growth should be encouraged and accommodated even in areas such as ours, whereas part of their role is to ensure a comfortable and well-ordered environment for existing Guildford residents. This national “obligation” should be challenged, to re-direct population growth and associated industry and commerce to other areas of the UK with less dense populations, thereby encouraging the spread of economic wealth to areas where it is needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
A3 Corridor Development

- There is a disproportionate number of new homes and associated development on Gosden Hill Farm, which will significantly and adversely change the appearance and nature of Burpham the area, and the north eastern side of Guildford in its entirety
- The combined developments of Wisley and Gosden Hill Farm represent too large a proportion of the overall Guildford plan developments, bearing in mind that of the proposed number of homes approx. 5,000 homes will be on this side of Guildford (incl about 1,000 homes in Send, Horsley, Burnt Common and Ripley in smaller individual developments)
- There has been no clear justification for the number of new homes to be built in Guildford, plus the consequent need of more employment space. How was this figure obtained? Just telling us that independent consultants were employed is not sufficient.
- The proposed designation of the employment site on Gosden Hill Farm as a Strategic Employment Site lacks any definitive justification, and will lead to increasing commercial development in future years, and thence to increased stress on the local infrastructure. It will further deteriorate the attraction of the local area to the disadvantage of existing Burpham and Clandon residents.
- There is a severe danger of significant loss of Green Belt, and the creation of an A3 conurbation stretching from Guildford northwards to encompass Ripley and Wisley, effectively all the way to the M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/668  Respondent: 11010273 / Dave Brownjohn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Transport

- It is unreasonable to seek approval of a local Plan without clarity on the essential issue of transport and roads infrastructure. The Plan indicates that road improvements will happen, but as some sort of evolving feast as directed by SCC and Highways England. This essential ingredient must be clearly defined for a Plan to be considered properly.
- In particular, the Gosden Hill development and it’s interaction with the A3 is not realistic. The suggestion of on & off slips to the A3 southbound only is ridiculous, and the alternative proposal by Highways England of a possible multi-direction interchange cannot be left to their discretion and to whether or not some funds can be found (because of course they will not). An integrated A3 multi-direction interchange plan must be part of the developers plan.
- The existing Clay Lane northbound access is just not sufficient, bearing in mind the extra traffic that will be generated by the various proposed housing and commercial developments to the north of the town, as well as Slyfield and Gosden Hill. It should also have some consideration of whether access/egress to Gosden Hill could be via the proposed improved interchange at Burnt Common, avoiding the otherwise inevitable increased congestion in Burpham.
- The current daily gridlock of the Burpham A3 exit slip and London Road seems to have been ignored, as is the gridlock caused every Sunday by the Aldi supermarket launching that week’s new special offers – great for their business but a nightmare for local residents trying to drive in Burpham.
The proposed changes to the Burpham A3 slip to become 2-way and part of the Sustainable Movement Corridor is farcical! There is no suggestion of any attempt to relieve the current traffic volumes causing the congestion mentioned above (and consequent air pollution), but rather it will be even more congested due to:
- the thousands per day of Gosden Hill traffic movements coming through London Road Burpham to reach Sainsbury/Aldi and the Northbound A3 access
- the significant extra traffic movements from the all areas this side of Guildford (incl Slyfield, Merrow, Godalming, Cranleigh and Dorking areas) which will come to Burpham to access the A3 Southbound via London Road (to avoid having to crawl through the Boxgrove/Woking Road/Parkway/Ladymead routes to get to the existing A3 Southbound access)
- the potential massive traffic congestion and pollution in the event of an accident on the A3 southbound, or the new Gosden Hill roundabout or within Burpham itself – there seems to be no contingency for this whatsoever

I support the Council’s enthusiasm for an A3 tunnel, but this potential traffic solution must also be integrated with the Burpham development plan, as the Burnt Common to A320 section of the A3 must be the likely start point for such a development. This cannot be left to just evolve

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3459  Respondent: 11010401 / J M Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to
consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as III as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:
2010 – 2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.
There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size. Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPS16/3451  **Respondent:** 11010401 / J M Bates  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.
I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctorscope, many of which are already at capacity? (Policy I1)
Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7567  
Respondent: 11010401 / J M Bates  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7591  
Respondent: 11010401 / J M Bates  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7594  Respondent: 11010401 / J M Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7556  Respondent: 11010401 / J M Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and...
general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID:</th>
<th>PSLPP16/7560</th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E2</td>
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I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
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<th>Comment ID:</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable
forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7588  Respondent: 11010401 / J M Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7582  Respondent: 11010401 / J M Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students are accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7585  Respondent: 11010401 / J M Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford’s relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”
The wording of the policy is too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer-led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be "closely related" Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances." The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7571  Respondent: 11010401 / J M Bates  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause
greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.
Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7575  Respondent: 11010401 / J M Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7578  Respondent: 11010401 / J M Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7549  Respondent: 11010401 / J M Bates  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from
the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/7553  Respondent: 11010401 / J M Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7542  Respondent: 11010401 / J M Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be
taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF's most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7545  Respondent: 11010401 / J M Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”.

Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible
change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

2. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

5. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

6. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

7. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

8. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

9. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation

10. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation

11. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound

12. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018

13. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.

7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SLP16/1147   Respondent: 11010401 / J M Bates   Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.
Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.
1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding
19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site...
will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4562  Respondent: 11010401 / J M Bates  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/2995  Respondent: 11010401 / J M Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp17q/586  Respondent: 11010401 / J M Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/234  **Respondent:** 11010497 / John Ackerman  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have attended a presentation at East Horsley Village hall and discussed the impact of the local plan with several of your officers who were there. The only amendments to the rejected Wisley airfield project was a slight expansion of the area with no increase in additional housing – wow. There is an arrogance in this that, despite huge objections and a rejection of the plans by the Planning Office, that they believe they can find a way to push it through. In essence, we don’t give a damn about the local residents. We are the power and you will do what we say.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/235  **Respondent:** 11010497 / John Ackerman  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I write to **OBJECT** to *Amended planning application 15/P/00012* for the following reasons:

**Sustainability:** The site is remote and occupants will rely on the use of the private motor car adding to traffic congestion on both the Strategic Route Network (the A3 and the M25) and local roads which are already running over capacity.

- The application relies on people switching to walking, cycling and public transport. This is unrealistic as it is two miles to the nearest railway station and at least half the route has no footpath. Roads are narrow and unlit.
- There is no spare parking capacity at either of the local stations.
- Sites of this size are required to provide outdoor open space. The applicant has “double counted” the outdoor space with that required for SANGS
- The loss of high quality agricultural land is in contravention of policy.

**Air quality:** The air quality figures are based on an unreliable transport assessment.

- The applicant has not used the DEFRA modelling statistics as required and rather appears used numbers from an unrecognised (and unreliable source)
- Poor air quality is exacerbated in the area by temperature inversions which trap the air. Young and old are extremely susceptible to poor air quality.
- Air quality is not improving as fast as expected, partly due to the excessive emissions (VW et al)
- The impact of poor air quality on RHS Gardens at Wisley and the Thames Basin Heath Special Protection Area (SPA) is already in excess of legal limits.

**Transport:** The transport assessment makes a number of erroneous assumptions and is not credible.

- It is completely unrealistic to assume that there will be a decrease in vehicle movements.
- There is no impact on traffic for the recently added secondary school, nor from the fact that prior to the school being built the children will have to be transported to the nearest available school in Leatherhead – adding to congestion.
- There appears to be no impact shown for the 270 daily bus movements or for the waste lorries or HGV deliveries to the site.
- The TRICS data used for comparison is not a relevant measure: site not comparable with a site in Guildford, nor a site 400m from the centre of Redhill, nor one on the edge of Staines.
- The traffic counts bear no relation whatsoever with counts submitted to Guildford or to Woking borough councils in support of other large development projects.
- The modelling in the Transport Assessment at 7 junctions close to the site bear no relationship to the daily experience of residents, evidencing flawed modelling.
- The number of daily trips is understated in the region of 1000 vehicle movements.
- Additional traffic will have a negative impact and cause irreparable damage to historic houses and other buildings in Ockham/ Ripley/Downside and further afield.
- If allowed, the impact of the additional traffic may prohibit other developments further south on the A3 or indeed those needed by the RHS

**Appropriate development:** The site is in the Green Belt in a rural location, hemmed in by the A3 to the west, the TBHSPA and the M25 to the north and the Conservation area of Ockham Village to the south.

- Green Belt boundaries can only be changed in the local plan process and in exceptional circumstances which have not been demonstrated
- The site is not big enough to provide satisfactory living standards even for “affordable housing”.
- Four and five storey buildings are not appropriate in the rural environment nor on an elevated site.
- Residents will be crammed in with little outdoor space, a noisy location, with very poor air quality. The density of housing proposed is similar to that in Islington.
- The site is clearly visible from the Surrey Hills AONB and as a result it will have a negative impact on views to and from the AONB.
Thames Basin Heath SPA/SSSI/SNCI: The impact of 2,068 houses on the environmentally sensitive TBHSPA cannot be mitigated. Damage will occur to the habitats of the protected and endangered rare species (including skylarks, nightjars and many others on the RSPB red list) in contravention of the EU Birds Directives and Habitats Regulations

- The siting of the proposed Suitable Alternative Natural Green Space (SANG) adjacent to the SPA will only increase visitor numbers causing further damage
- Part of the SANG is in a designated flood plain
- Para 119 of the NPPF “presumption in favour of sustainable development” does not apply where development requires assessment under the Birds or Habitat Directives
- It is impossible to state without doubt that the mitigation proposed will prevent damage to the SPA particularly in the light of inadequate traffic/air quality reports.
- There are likely to be over 700 dogs and 700 cats living on the proposed development. These will be a constant threat to ground nesting birds on the SPA and cannot be mitigated by one warden working a normal working day.

Impact on the local area: The additional 5,000 residents is the equivalent of almost doubling the population of East and West Horsley combined. This increase in local population will impact:

- Light pollution, noise, traffic and infrastructure which has been gravely underestimated and proposed mitigation measures are totally inadequate
- The cumulative development in the borough and in the neighbouring boroughs of Woking, Waverley and Elmbridge per the objections from both Elmbridge Borough Council and Woking B C
- The water table and flooding in the area. It appears that no impact assessment has been done relating to the loss of agricultural land which currently soak up a significant volume of rainwater.
- Listed buildings adjacent to it such as Yarne, Bridge End House and Upton Farm
- Via closure of a number of local roads coupled with an increase in traffic will affect a large number of road users from Cranleigh to Cobham and everywhere in between

Inaccuracy of the documentation: There are factual errors in the documentation

- Highways England have recommended that the proposal cannot be determined due to the applicants failure to provide traffic data in the format required
- There are a number of misrepresentations in the paperwork e.g. nine stations within 5 miles – this is however “as the crow” flies – only Horsley and Effingham Junction are within 5 miles by usable road from the middle of the development
- The applicant’s description of the site as brownfield is a gross over-simplification. 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remaining runway, a habitat for rare flora and fauna, (14ha) has never had buildings. The remainder of the site (55%) is high quality agricultural land.

Other: This site is not deliverable within 5 years due to problems with sewerage and water capacity, outlined by Thames Water & the OCK DVOR air traffic control beacon which limits development until 2022

- No very special or exceptional circumstances exist - Alternative sites exist
- The proposal includes the site SCC safeguarded for waste under the Surrey Waste Plan
- The site is not listed for development under the existing 2003 Local Plan
- There is not enough land to provide a sustainable community based on GBC’s own parameters
- There is no update at all to the Heritage study despite the significant Bronze Age haul found in Ockham village in May 2013 and the likelihood of further remains on the site.

I trust the Council will find this useful, in their deliberations

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/498  Respondent: 11010497 / John Ackerman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The other development issues in the local plan are still the same as before. You want to cram houses into some fields (533 I counted) in East and West Horsley, plus 2200 at Wisley and Ripley is under siege as well. I have protested in the past, but as this is a theoretical amendment, I am protesting again. Sites 38, 39, 40, and 41 are unsuitable. The village is small and the roads are narrow. The required lorry and construction traffic will jam the entire area for years and once it is completed will overwhelm the local facilities. You cannot get a doctor’s appointment for several days at the moment and another 1500 residents certainly wont help and that’s without the Wisley Development. Local schools are already under pressure and Secondary schools particularly. There is no provision for road improvement in Horsley.

The Ockham Road North development by the railway bridge will put hundreds more cars a day onto a difficult road, with narrow pavements, single file in places and significantly increase the risk of a pedestrian being struck by a passing car or lorry wing mirror. The road also floods easily and regardless of flood risk controls in building, the water will continue to fall and has to go somewhere. You cant just keep adding to a 1930’s infrastructure. The whole thing needs to be re thought if you are doing something like this. I did note that none of the Council representatives lived in the area!!!

The other 2 proposals in West Horsley are also overkill. You may have noticed that there is a stop and go bit of road where it is too narrow for cars to pass and only one lane can go at a time. East Street is certainly not suitable for an increase in traffic of this magnitude.

The final proposal in Ockham Road North is at least a bit further out, but still adds a significant volume of traffic to an already over busy road. I have live there for 27 years and the traffic increase is amazing in that time. It frequently takes several minutes to get out of my driveway and of course there is the mother’s jam at Raleigh and Glensk schools.

In addition I have repeated the very well thought out objection to the Wisley Airfield below and there is nothing significant in the new plan which changes that situation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3634  Respondent: 11010945 / Stephen Gill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I continue to object to the inclusion of policy A35, Three Farms Meadows (formerly, the Former Wisley Airfield), in the proposed Submission Local Plan for many reasons including:

1. It is the least sustainable strategic site identified in both this version and in previous versions of the draft Plan because of the constraints applicable to this area of Green Belt and nature conservation protected land, and its physical location. I object to its continued inclusion in the Plan.

2. This is Green Belt, high quality, farmland, a nature conservation area in and of itself, and immediately adjacent to an SSSI and SPA. Conservation area Ockham Village, including many listed buildings, borders this area of land.

3. It is surrounded by narrow, winding, weight-restricted, country lanes unsuited to any increase in traffic – let alone the approximately 5000 cars likely to result from a housing development of 2100 houses, or the heavy construction vehicles likely to be needed - over many years – for its construction.

4. The transport evidence base including the SHAR 2016 Highways assessment report has been criticised by Mouchel for using out of date modelling software and is therefore unreliable, thus making all transport predictions unreliable and unrealistic.

5. The statement that sustainable methods of travel such as cycling and walking would be used for access to and from the site are totally unrealistic. The roads in the vicinity are already dangerous for walkers & cyclists and will be made even more so with the increased traffic that will come from the site.

6. Almost all residents will have to travel from the site to work. People will not walk/cycle on narrow unlit local roads on a regular basis – they will travel by car. This additional vehicular traffic will both make the roads more dangerous for other users and add to the congestion.

7. It has no infrastructure at all - it is Green Belt, high quality, farmland, and therefore has no gas, water, electricity or sewage connections, and no buildings at all. It is also prone to flooding in parts, making drainage from 2100 houses on concreted over land a particular challenge but one which appears not to have been properly considered.

8. It is remote from railway stations and there is currently no public transport that serves the area, and nor is the area suitable for public transport. These are narrow, winding, weight-restricted country lanes.

9. The facilities at the closest railway station are already at capacity, are as the rains during peak hours. The increased demand from the site cannot be absorbed.

10. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs.

11. The site is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum. The associated traffic increase from the RHS traffic together with the increased traffic form regular events at the RHS have not been taken into account in traffic assessments.

12. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.

13. Local schools, surgeries and railway stations/trains are already full, and there are no obvious local employment opportunities for 2,100 households (assuming 2 adults per dwelling, that equates to 4,200 jobs).

14. It is not clear who would want to live in this new dormitory town, remote from employment, entertainment and any form of infrastructure, where the householders would be entirely dependent on their cars.

15. Housing need - and the figures relied upon by the Council – is anything but transparent, despite requests for information about the basis for the Council’s/its agent’s calculations. Housing “need” is a very different thing from the “demand” for housing in Guildford. Despite this, I understand that adjoining boroughs have made very different (and much lower) assessments of their “housing need”. Guildford need to review their methods of assessment for housing need and bring them in line with other neighbouring councils.

16. I understand that Surrey University has planning permission to build, on its own campus, sufficient accommodation for all of its students, but has failed to implement that permission. It should be made to do this, freeing up housing stock in Guildford town centre which by default has all the necessary infrastructure and support for additional housing.

17. Guildford town centre – Walnut Tree Close, for example – already has significant areas of former built/industrial development, again with pre-existing infrastructure in place. Sustainable housing development should clearly be concentrated here.

18. I object to the quantity of space allocated for retail in Guildford town centre. This could be much better used for residential development. I particularly object to the reliance on the Carter Jonas study update 2017 which includes “demand” for retail space from companies in administration.

19. I object to the fact that the Council has still failed to remove the Three Farms Meadows (site A35) from the Plan despite receiving 1000s of objections to its inclusion - from residents and from statutory consultees.
20. There appears to be no clear justification for the removal of one (other) strategic site from the Plan. Why hasn’t Three Farms Meadows (site A35) been removed? What is the justification for the removal of the other site? Three Farms Meadows (site A35) should now be removed from the Plan.

21. I understand that the Council considers that there should be consultation only on the changes it proposes should be made from the previous version Plan. I object to this. Many people will therefore be discouraged from participating in this consultation, and will not appreciate quite how much has changed from the previous version Plan. Moreover, the complexity and length of reports/documents, many of which are not available in hard copy, further discourages debate and participation in it.

22. I object to the timing of this consultation – yet again in the context of the local plan/proposals in relation to Three Farms Meadows, time limits for submission of comments/objections expire during the school summer holidays – once again limiting debate.

23. I object to the fact that there has been no clear explanation from the Council as to why it thinks it is appropriate to have a (limited) regulation 19 consultation. I believe the proposed changes to the Plan are major.

24. I object to the proposed increase in the size of site A35 (Three Farms Meadows) as this now abuts additional heritage assets, including Upton Farm and Bridge End House, further adversely impacting the setting of these buildings and the wider Ockham Conservation Area.

25. I object to the fact that the proposed increase in site area, being on the south side of site A35 (Three Farms Meadows) and facing (therefore) the Surrey Hills AONB, will increase the negative impact of the views from the AONB.

26. I object to the proposed change of site boundaries to site A35 (Three Farms Meadows). Nor are these identified correctly on the plan (Appendix H p16).

27. I object to the proposed removal of an additional 3.1 ha from the Green Belt that the proposed change of site boundaries to site A35 (Three Farms Meadows) would entail.

28. I object to the change in Green Belt boundary to the eastern end of site A35 (Three Farms Meadows), as this now encloses an area of high archaeological impact.

29. I object to the inclusion in the Plan of site A35 (Three Farms Meadows) as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

30. I object to the extension of the Plan period by 1 year – this is a major change and as such this current review should be of the whole Plan and not just the changes.

31. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

32. I object to the idea – mooted by the Council at one point of this process – that loss of Green Belt land in one part of Guildford Borough could be “compensated” by the re-designation of other land, in another part of the Borough, as Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
2) Similarly, it makes no sense to remove the Wisley site from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. No exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) It also appears that a disproportionate percentage of the development is being targeted at our bucolic corner of the borough, notwithstanding the Greenbelt and infrastructure issues.

4) The proposed development of the site would pose a threat to the historic rural village of Ockham and create a blight on properties there. There would be knock-on negative effects on the small hamlet surrounding Ockham Mill, where I live.

5) There would be very negative effects on transport, local roads and road I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest. I already have difficulty exiting Mill Lane in the morning en route to Horsley. Adding more traffic to the Ripley exit roundabout will make it impossible for me to exit.
6. The lack of suitable public transport. The local rail station of Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity. I use the Horsley station parking lot and it’s completely full every day—where are the additional cars supposed to go?

6) Insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

7) I live downstream from the site in a flood-prone location and there has not been adequate attention paid to the increased flooding risks created by the development.

8) Air quality concerns have not been taken seriously -air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted Additional traffic will exacerbate this situation, impacting the health of all current and future residents. I worry about the health of my children.

9) I don't understand why the site has been included after the related planning application has already been unanimously rejected by GBC’s Planning. It makes me wonder whether the developer has exercised undue influence on the process, and I have to question the motivation behind the decision to retain this site in the plan.

I ask that the Council reconsider and now, once and for all, remove this site from the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1870 Respondent: 11010977 / Hilary S Foulkes Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Wisley Airfield site

I live in an historic building not far from the site that includes the former Wisley airfield and strongly object to the inclusion of the site in the draft Local Plan:

1. It makes no sense that a majority of the new housing is proposed to be built within the Green. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. I don't understand how councillors can now ignore election manifesto promises.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3385  Respondent: 11011041 / Alan C Burchett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

45 houses at Clockbarn Nursery

I object to this development.

Tannery Lane is again a narrow rural lane that will suffer from the building of a Marina and 64 apartments which I believe have already been approved. So additional houses would be most unsuitable.

Send Road is far too busy as it is with frequent traffic jams that grid lock the whole village. It would be totally wrong to have any more traffic entering Send Road from any further Tannery Lane development. The junction onto Send Road from Tannery Lane is already a dangerous crossroad which cannot be improved without demolishing extremely old cottages on the left or a garage on the right. The other end of Tannery Lane is a single track that runs towards Ripley and Pyrford which could certainly take no more traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3386  Respondent: 11011041 / Alan C Burchett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
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<tr>
<th>400 houses and 7000 sq. metres of industrial space at Garlick’s Arch</th>
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<td>I object to this development.</td>
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<tr>
<td>The infra structure of Send, Ripley or Clandon could not possibly support this size of development. The roads, schools, doctors etc. are already over stretched.</td>
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<td>This is a Green Belt site of ancient woodland that is prone to flooding. It would be totally wrong to build factories or houses on it. What is the evidence that we need additional industrial space? Also it appears that the housing needs of Guildford are being hugely exaggerated.</td>
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<td>Even if there was a need for this development this site would increase the traffic flow onto the A3 and the M25 which are already extremely overburden. It can take 45 minutes to travel three miles south on the A3, past the Wooden Bridge bypass, almost every day during busy periods. Not to mention Northbound towards the M25 which can be at a standstill for long periods on a very regular basis.</td>
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<td>Why was this development not listed on the original Local Plan? How could such a huge development be such a last minute thought? It sounds extremely suspicious!</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<th>New interchange with the A3 at Burnt Common</th>
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<td>Again this development would hugely increase the volume of traffic using Send Road in both directions. As I previously stated this road is already extremely busy and frequently grid locked which is totally unfair on the people who live in Send.</td>
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<tr>
<td>None of these proposed developments seem to have considered the larger picture. The effect on the infrastructure, especially the traffic, I am shocked at such poor planning. It seems we are being bombarded by totally inappropriate developments with an expectation that we will complain</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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### Comment ID: PSLPS16/3384  Respondent: 11011041 / Alan C Burchett  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. **40 houses and 2 travellers’ pitches at Send Hill**

I object to this development.

This is definitely not suitable land to build houses on as it is a landfill site. When I first moved into the village I was a builder and I used this site to dump all my building waste, everything went in it, including I believe blue asbestos. It would be wrong to expect people to live on this site either in houses or in travellers’ caravans. I would make it my business to explain to any perspective buyers just what their houses were built on. It would be my moral duty!

Send Hill is a narrow country lane which already suffers from severe congestion when the school traffic is at its busiest. Speeding cars also using it as a route off the A3 from Potters Lane. Also the main drains could not take the extra capacity.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: PSLPP16/7473  Respondent: 11011041 / Alan C Burchett  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I have lived in the village of Send for over 40 years so I know the area extremely well.

I object strongly to the following proposals in the village of Send listed in the Local Plan:

1. **Removing Send from the Green Belt**

I object to Send losing its Green Belt status

I do not understand how you have the right to change the Green Belt. It was meant to be a permanent feature designed to stop towns and villages merging into one huge conurbation. Also its purpose was to encourage the use of derelict and other urban land. I don’t believe that there is an urgent need to change the status when there are still brown field sites in the borough. Is this a government ruling of a financially driven move that will allow property developers to make a lot of money? We have already lost the only piece of woodland in the village when permission was recently granted to build on the land behind Vision Engineering.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
<table>
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<tr>
<th>Comment ID: PSLPS16/4196</th>
<th>Respondent: 11011585 / Martin Walker</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I object to the proposed development of 2000 houses at Gosden Hill as it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

I object to the fact that this site was not included in the Regulation 18 draft and has not been consulted upon previously. Full consultation is required.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<th>Comment ID: PSLPS16/4198</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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</table>

I object to the large proposed development of 2,000 houses at Wisley Airfield as it will destroy large areas of Green Belt and agricultural land and produce massive congestion on the A3 and surrounding roads including Ripley and Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPS16/4194</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed industrial site at Garlick’s Arch. There is no need for such a site. The Employment Land Needs Assessment 2015 shows a reduction in required employment floor space from the previous draft plan. If the Council truly believes there is a need for such a large amount of industrial space it should be located at the current Slyfield site.

I object to the development of the 400 houses at Garlick’s Arch. It was included in the Local Plan at the last possible moment, with no prior local consultation. It is not required in terms of housing need either for the village or the borough. Also the site is liable to severe flooding and the woodland is a particularly sensitive area that must not be disrupted in any way.

I object to the fact that this site was not included in the Regulation 18 draft and has not been consulted upon previously. Full consultation must take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4195  Respondent: 11011585 / Martin Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed interchange onto the A3 at Burnt Common. The interchange will cause the A247 to become a through-road between Woking and the M25. Send is building a new primary school on that particular stretch of the A247. Creating the new interchange, together with the additional school traffic, will cause immediate and virtually permanent gridlock on the A247. Village life will be severely disrupted.

I object to the fact that this site was not included in the Regulation 18 draft and has not been consulted upon previously. Full consultation is required.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4197  Respondent: 11011585 / Martin Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development of 40 houses at Send Hill. It consists of particularly high quality Green Belt within an area of particularly beautiful countryside which would be destroyed by this development. The subsoil of the existing site contains documented unsafe landfill waste which is currently vented. The proposal for 2 travelers’ pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

I object to the fact that this site was not included in the Regulation 18 draft and has not been consulted upon previously. Full consultation is required.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8816  Respondent: 11011585 / Martin Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the failure of the Council to identify sufficient brownfield sites within the Guildford urban area, which must be targeted first for development before countryside and the Green Belt. I also object to the failure of the Council to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8815  Respondent: 11011585 / Martin Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the removal of Send from Green Belt status and to the proposals to build on the Green Belt fields at Gosden Hill, Garlick’s Arch, Send Hill and Clockbarn Nurseries, particularly Sites A25, A35, A42, A44 and A43. NPPF states that the Green Belt should only be altered in “exceptional circumstances.” There simply are no eligible exceptional circumstances expressed in the Local Plan or supporting documents. The Council must identify the urban brownfield areas around the Guildford area in order to protect the countryside and limit the impact that any plans have on local road traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8817  Respondent: 11011585 / Martin Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the figures given in the West Surrey Strategic Housing Market Assessment that are the basis for the Draft Local Plan. No evidence has been given to substantiate the projected housing numbers, which in my view is far in excess of reality.

Housing numbers should be based on post-Brexit projections. The figures for economic and population growth, including migration now need to be revised downwards.

I object to the fact that no consideration has been made to the impact on local infrastructure. How can the current infrastructure possibly be adequate enough to deal with proposed new housing levels. Roads, doctors and schools will be unable to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1226  Respondent: 11011585 / Martin Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Overall, I object to the approach that the Council is taking to the consultation. During the re-drafting of the 2014 draft Local Plan, instead of finding a sensible alternative the Council has changed all the major sites in Send and added a large road junction. It is beyond belief that the Council suggest that they have listened to us, the residents, yet have actually increased the planned housing levels in the village. These changes are significant so require another full consultation under Regulation 18, not the short-cut of Regulation 19 which the Council is using.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
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<th>Comment ID: PSLPA16/4198</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I have read through the above document and wish to express my concern that my village of West Horsley will be changed out of all recognition if these proposals go ahead. No exceptional circumstances have been made to justify removing the village from the Green Belt. (Policy 2)

I object to the development of 385 homes on the 4 proposed sites which are at a much higher density than currently exist in the village. Little firm policies with respect to infrastructure and essential facilities are given. The current facilities would not support such a large increase in housing with its associated population and needs.

West Horsley struggles with inadequate medical, schooling and retail facilities with poorly maintained rural lanes.

Public transport is currently inadequate with no link to train times to enable residents to travel to work in a more environmentally friendly way. The proposal to increase the population of West Horsley with so many new homes will only exacerbate the currently woeful situation of crammed car parks and clogged lanes.

The fact that several village shops have been allowed by Guildford Borough Council to be developed into flats and small bungalows demolished to make way for 4 and 5 bedroom homes, gives little confidence that the proposals for preserving the historic environment, protecting the countryside and creating sustainable facilities will be honoured.

The Guildford Plan policies are totally inappropriate for this rural village and I urge you to reconsider this proposed submission.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
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<th>Comment ID: pslp173/160</th>
<th>Respondent: 11011617 / Pamela Holt</th>
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</table>
| I object to the intention to remove my village of West Horsley from the Green Belt and the plan to create inappropriate housing developments without the appropriate infrastructure. 

The rural nature of the village would be irreparably damaged with a consequent loss of openness.

The projected need for housing has been shown to be inaccurate therefore this 2017 plan is flawed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: |

<table>
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<th>Comment ID: PSLPA16/3572</th>
<th>Respondent: 11011713 / Mary Warren</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
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| I object to the latest version of the local plan because of the inclusion of several developments which were not on the previous versions and which were inserted only 2 weeks prior to the publication of the so-called 'Final Version'. In particular, I object to the proposed development at Garlicks Arch associated with a new junction on the A3. These developments were not available for consultation and have been put in at the last minute. 

- I object to the stated need which requires building 13,860 houses in the Guildford area. This figure has never been fully explained and was based on pre-Brexit calculations. 

- I object to the unreasonable and unfair allocation of these houses, most of which are proposed to be built on Green Belt land around and in the villages which surround Guildford. This would lead to a vast conurbation in South West Surrey, the equivalent of the area around Croydon. Guildford would cease to be an attractive place to live and work leading to the detriment of its reputation. At the last election, the Conservative Government made a manifesto pledge to protect the Green Belt. Why can this pledge be easily broken when the 7 day NHS is sacrosanct? 

- I object to the removal of the villages from the Green Belt. Green Belt land is not just to make the villages pretty. It provides agricultural land, water catchment and flood control (Guildford is an area which floods easily), a carbon sink for air pollution, and benefits to public health and well being. It is vital to the rural economy and to the life of the villages. 

- I strongly object to the Garlick's Arch proposal. This is an area of ancient woodland and permanent Green Belt. There is no reason to develop this land when there are suitable development sites close by at Slyfield. The need for industrial use is unclear. Send is surrounded by office blocks, not all of them filled. There are a lot of sites where the businesses have closed in Guildford town centre. Why can these not be used instead? 

- The road infrastructure, the water system and drainage are at full capacity. In particular, traffic in Send Barns Lane is at a standstill at busy periods of the day. The surrounding roads are narrow and not suitable to the
volume of traffic which currently uses them as a cut through. The A25 through West Clandon is extremely narrow in places and lorries and cars cannot pass each other without mounting the pavement.

- I object to the new junction on the A3 which will disgorge even more traffic on to the roads making the traffic problem unacceptable.
- I object to the failure to explain where children from these new houses will go to school. St. Bedes is being redeveloped on the Send School site and it was stated clearly in the planning process that there would be no increase in the number of places for children at the new school!
- I object to the proposed development of traveller's sites and houses at the top of Send Hill. This is an area of land which was previously landfill (not quarry as laid down in the local plan) and has been recognised as a health hazard from contaminated industrial waste with unacceptable methane levels.
- I also object to this development which is sited on a very narrow road which meets Potters Lane at a blind corner where there are already several accidents each year.
- I object to the development of the Clockbarn Nurseries in Tannery Lane. Tannery Lane is an extremely winding and narrow road completely unsuited to heavy traffic. Traffic from Tannery Lane has to exit either on to Polesden Lane which is also very narrow or on to Send Road where there is already considerable congestion and the junction is very dangerous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2316  Respondent: 11011713 / Mary Warren  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A42. Tannery Lane is an extremely winding and narrow road with little scope for increased traffic. The addition of a further 15 houses to the already planned 45 to make a total of 60 new houses will overload the access road considerably and lead to traffic jams and an increased number of accidents, some of which could be fatal. The junction of Tannery Lane with Send Road (A247) is particularly dangerous despite the new double yellow lines and is already the site of accidents. This situation will only worsen if the local plan is carried out.

As with Garlick's Arch, flooding is already a known problem along Tannery Lane and development of the size suggested will intensify this.

Once again, Guildford Borough Council are paying no attention to the Green Belt which will be further eroded by this development with loss of the openness required to protect the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2262  Respondent: 11011713 / Mary Warren  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43  I object to the development of Garlick's Arch. This is supposed to be an area of permanent Green Belt with ancient woodland from Elizabethan days and, so far, no exceptional circumstances have been put forward to explain why the land should be used for development. The addition of 8 Travelling Showpeople plots is unnecessary. This is the entire complement of this type of plot required of Guildford Borough Council. Why are all to be at Garlick's Arch when it is an area of outstanding beauty?

In addition, this area is prone to flood with a flood zone allocation 2. If developed, this flooding will be intensified to the detriment of the surrounding countryside.

I am still unclear where all the children from this development will go to school. Send School has no capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2315  Respondent: 11011713 / Mary Warren  Agent: 

Policy A43  I object to the development of Garlick's Arch. This is supposed to be an area of permanent Green Belt with ancient woodland from Elizabethan days and, so far, no exceptional circumstances have been put forward to explain why the land should be used for development. The addition of 8 Travelling Showpeople plots is unnecessary. This is the entire complement of this type of plot required of Guildford Borough Council. Why are all to be at Garlick's Arch when it is an area of outstanding beauty?

In addition, this area is prone to flood with a flood zone allocation 2. If developed, this flooding will be intensified to the detriment of the surrounding countryside.

I am still unclear where all the children from this development will go to school. Send School has no capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2261  Respondent: 11011713 / Mary Warren  Agent: 

Policy A43  I object to the development of Garlick's Arch. This is supposed to be an area of permanent Green Belt with ancient woodland from Elizabethan days and, so far, no exceptional circumstances have been put forward to explain why the land should be used for development. The addition of 8 Travelling Showpeople plots is unnecessary. This is the entire complement of this type of plot required of Guildford Borough Council. Why are all to be at Garlick's Arch when it is an area of outstanding beauty?

In addition, this area is prone to flood with a flood zone allocation 2. If developed, this flooding will be intensified to the detriment of the surrounding countryside.

I am still unclear where all the children from this development will go to school. Send School has no capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy A58. I object to the increased development of Burntcommon which is now expected to provide a **minimum** of 7000sq.m of employment floorspace and not a maximum. There are empty sites and industrial units at Slyfield and in Guildford which could be used before taking away Green Belt land. Send, Ripley and West Clandon will become a vast semi-industrialised suburb of Guildford similar to the urban sprawl of Croydon.

Already the roads around Burntcommon are inadequate for the amount of heavy traffic which uses them. The A247 through Send and West Clandon is narrow and in places cannot accommodate 2 lorries side by side, leading to holdups with diesel fumes being pumped into the air while the lorries wait. Extra heavy goods vehicle would make the situation intolerable for the ordinary motorist and for the residents of both villages.

The road passes 2 schools which are situated on the road with the playgrounds not far removed from the traffic. In light of the current evidence of the damage done to children's lungs by exposure to diesel fumes, it seems rather self-defeating to increase the traffic on these roads.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/2314  **Respondent:** 11011713 / Mary Warren  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

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Policy A58. I object to the increased development of Burntcommon which is now expected to provide a **minimum** of 7000sq.m of employment floorspace and not a maximum. There are empty sites and industrial units at Slyfield and in Guildford which could be used before taking away Green Belt land. Send, Ripley and West Clandon will become a vast semi-industrialised suburb of Guildford similar to the urban sprawl of Croydon.

Already the roads around Burntcommon are inadequate for the amount of heavy traffic which uses them. The A247 through Send and West Clandon is narrow and in places cannot accommodate 2 lorries side by side, leading to holdups with diesel fumes being pumped into the air while the lorries wait. Extra heavy goods vehicle would make the situation intolerable for the ordinary motorist and for the residents of both villages.

The road passes 2 schools which are situated on the road with the playgrounds not far removed from the traffic. In light of the current evidence of the damage done to children's lungs by exposure to diesel fumes, it seems rather self-defeating to increase the traffic on these roads.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Policy 2 Paragraph 4.3.15 Removal of Send Business Park from the Green Belt. As already stated in the above objection, Tannery Lane is a narrow winding road completely unsuited to large HGVs. Already they cause considerable traffic problems and any increase in their number along this road will bring traffic to a standstill both in Tannery Lane and at its junction with the A247. The other exit from Tannery Lane is equally difficult and again unsuited to heavy traffic.

In conclusion, Send residents objected strongly to the previous version of the local plan. Despite this, the load on Send has increased. One has to wonder why Guildford Borough Council should single Send out for such over development when there are vacant brown field sites in Guildford and at Slyfield. No changes are proposed to the roads, schools, medical facilities or other essential infrastructure and the result will mean that Send becomes an overdeveloped suburb of Guildford with congested roads and traffic at a standstill pumping fumes into the air and damaging children's lungs. Is this really what they want?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Key Evidence document ‘Guildford Borough Economic Strategy 2013-2031 makes no case for locating large numbers of homes in West and East Horsley or neighbouring villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6311   Respondent: 11011745 / Daniel Hill   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is no evidence that there are exceptional circumstances for encroaching on our green belt and this plan is not wanted by the vast majority of people who live in this area. This plan will irreparably damage the rural and quiet nature of our village life.

I am totally opposed to the village's removal from the Green Belt by insetting and extending the 2003 Local Plan Settlement Area boundaries. No exceptional circumstances or other justification is made for the new Green Belt boundaries that will result from the proposed insetting of the two parts of the village from the Metropolitan Green Belt. West Horsley's defined Settlement Area boundaries (ref 2003 Local Plan) DO NOT need to be extended.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16869   Respondent: 11011745 / Daniel Hill   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
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There is no evidence that there are exceptional circumstances for encroaching on our green belt and this plan is not wanted by the vast majority of people who live in this area. This plan will irreparably damage the rural and quiet nature of our village life.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6314  Respondent: 11011745 / Daniel Hill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S2 states that provision will be made for 13,800 new homes over the Plan Period 2013 to 2033. The number of homes is too high and unsustainable in Guildford’s villages.

The need for so many houses to be built in West Horsley over the first 5 years of the Plan period 2018 to 2033 is totally unproven.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16870  Respondent: 11011745 / Daniel Hill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S2 states that provision will be made for 13,800 new homes over the Plan Period 2013 to 2033. The number of homes is too high and unsustainable in Guildford’s villages.

The need for so many houses to be built in West Horsley over the first 5 years of the Plan period 2018 to 2033 is totally unproven.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Development of this part of Send will result in even more traffic flow on the already heavily congested A247. Furthermore, I do not think that a quiet country road, such as Tannery Lane, should be subjected to levels of traffic that it was never designed to cope with. I also note that the 60 homes are proposed on this development, representing a 33% increase on the previous number put forward. Aside from the traffic problems already outlined, this represents far too high a number.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Given that there are still empty industrial sites in Slyfield and Guildford, I do not think that this site should be developed – particularly when it is in the middle of the Green Belt. This development would also have a huge impact on the smaller and already overly congested roads in the Send and Ripley area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the proposal to take Send Business Park out of the Green Belt because it is located in an area of beauty next to the Wey Navigation. This development would result in more vehicles using Tannery Lane, making it even more difficult to negotiate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4175  Respondent: 11011777 / Sally Norton  Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A46.  

This land is located with land parcel H12 as identified in GBCS Vol IV. The land is DEFRA agricultural land Grade 3A and has been farmed traditionally for pasture (sheep and cattle) and for grain (wheat and barley) in perpetuity. The land contains many stands of scheduled Ancient Woodland. The land contributes to the ‘openness’ of the Green Belt between the settlements of Flexford and Normandy and should remain ‘washed over’ by the Green Belt.

Legal Precedent

I object to the removal of the land allocated to Policy A46 by removal from the Green Belt by “inset” under NPPF para 83 and 84.

The “exceptional circumstances” required to redraw the Green Belt boundary for the land in Policy A46, appear nowhere in the Local Plan of so how can I judge this proposal?

In the Gallagher Homes Ltd v Solihull Borough Council [2014] EWHC 1283 (Admin), Hickinbottom J decision in particular lays out:

“Exceptional circumstances are required for any revision of the boundary, whether the proposal is to extend or diminish the Green Belt. That is the ratio of Carpets of Worth.

Whilst each case is fact-sensitive and the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgment, what is capable of amounting to exceptional circumstances is a matter of law, and a planner may err in law if he fails to adopt a lawful approach to exceptional circumstances. Once a Green Belt has been established and approved, it requires more than general planning concepts to justify an alteration.”

Without the “exceptional circumstances” included in the proposals for this Policy it appears unsound.
I object to the use of a 2010 survey of parishes that was not represented to parish councils as to be part of the Local Plan evidence base in an attempt to present the two settlements as one in the Settlement Profile document. It is recognised in the Settlement Hierarchy that Flexford and Normandy are separate settlements, neither rank highly based on their individual sets of community facilities and services (Normandy 13, Flexford 27 sustainability ranking in Settlement Hierarchy report).

There is no traditional community centre. The ward contains five hamlets in a dispersed area. It is disingenuous to represent Flexford and Normandy as a combined community.

The incorrect assessment in the Settlement Profile document has been pointed out under Regulation 18 consultation but the council continues to include this flawed document as evidence.

It should be discounted and removed from the evidence base.

Use of educational provision as “exceptional circumstances”

I object to the proposed site of Normandy/Flexford (Policy A46) for a new Secondary School; this should be rejected as the need for such a school in the location has not been proven. GBC in the Infrastructure Delivery Plan, May 2016 indicate that SED 3, IDP p87, a 7-form entry (7FE) secondary school at the Normandy / Flexford strategic development site, requires only 1 FE to serve the development site itself, the remaining capacity would serve the wider area, including Blackwell Farm site (Policy A26). However, given that the proposed Blackwell Farm development is for 1,800 dwellings, on a pro-rated basis of children of secondary school age within the arising population, this would only require a maximum of 2FE. Together, the Blackwell Farm site and the Normandy/Flexford site require only an estimated 3 FE provision. The proposed school is excessive in size, being more than twice as large (7FE) as the estimated need (3FE), and as other information provided here indicates, this is well within the funding and expansion capabilities of existing schools in the western wards of Guildford borough and the western side of the town. Every neighbouring secondary school is currently undersubscribed, Kings Manor in particular with 57% of its school places currently unoccupied.

SCC Education Officers need to demonstrate a clear need for such a school at this, given the current under-subscription of all the neighbouring secondary schools in the western wards of Guildford borough. There are currently 736 vacancies at the nearest secondary schools serving the western wards - not accounting for the 480 extra at the new Technical College to open in 2018 - a combined capacity of 1,216. In addition to those, SCC has already approved expansions at the County School, Guildford and St Peters.

Adding forms of entry to several existing schools will see the costs absorbed after the initial capital cost needed to create a few extra rooms and they still only require one headteacher, one set of staff etc. The Head Teacher and Chairman of Governors at Ash Manor School have offered to cooperate with a programme to expand that school, as had the Principal at Kings; if it needs expansion in the future there is space and a willingness to do so.

Contribution to the Purposes of the Green Belt

I object to the overriding of the contribution the land proposed for Policy A46 makes to the 5 purposes of the Green Belt in response to a developer-led proposal for large-scale house building in the Green Belt in Policy A46.

Guildford Borough Council recognises the contribution the land surrounding and within the settlements of Normandy and Flexford makes to the five purposes of the Green Belt in identifying land parcels H10, H12, H13, H14, H15, H16, J16 and J17 of particular sensitivity in its reevaluation of the land parcels in the Green Belt & Countryside Study, Vol 2 Addendum, Appendix 1 and 2, reinforcing the evaluation in GBCS Vol 1. The evaluation of the ‘land parcel’ is laid out in the tables in GBCS Vol 4. The ‘land parcel’ that contains the land proposed for Policy A46 is H12, evaluated against 4 purposes of the Green belt it performs as follows:

- Checks sprawl of Normandy and Flexford
- Prevents Flexford and Normandy from merging
- Assists in safeguarding the countryside from encroachment
All of this is then ignored in the rush by GBC to appease Taylor Wimpey in order to affirm another strategic housing site and hold its hands up as if to say “not us Guv, its wos the developer that done it”.

Contribution to ‘openness’ of the Green Belt

I object to the rejection by GBC that the land proposed for Policy A46 fails to contribute to the “openness” of the Green Belt.

In the case of Normandy and Flexford, there have been two planning appeals concerning Gypsy pitches (Palm House Nurseries and Green Lane East) where the inspector agreed that land near Flexford and land to the west of Glaziers Lane exhibited ‘openness’. The inspector found in favour of the appellant on other grounds but the opinion on ‘openness’ in those judgements is evidence that the land around Normandy and Flexford is considered by the Planning Inspectorate to exhibit ‘openness’. A third more recent decision at appeal for housing development at North Wyke Farm found that the land contributed to the ‘openness’ of the Green Belt.

• Palm House Nurseries GBC 09/P/01851, Application 12 November 2009 Appeal Ref: APP/Y3615/A/10/2131590 Decision 24 Feb 2011
• Green Lane East GBC 10/P/00507, Application 8 March 2010 Appeal Ref: APP/Y3615/A/10/2140630 Decision 14 June 2011
• North Wyke Farm GBC 14/P/00779, Application 17 April 2014 Appeal Ref: APP/Y3615/W/15/3002308 Decision date: 14 July 2015

I believe this indicates that PINS inspectors recognise the “openness” of the land around the two settlements of Normandy and Flexford and their contribution to the “openness” of the Green Belt.

Impact on Surrey Hills AONB

I believe both settlements should remain ‘washed over’ by the Green Belt as stated in NPPF para.86 “If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt”.

The land designated as AGLV and identified as 12-1 in the Map AONB Boundary Review - Recommended Areas for Consideration and pp28-29 AONB Area of Search Evaluation - Natural Beauty Evaluation, Oct 2013 report to be added to the Surrey Hills AONB, reinforces the proximity of valued landscape as it will add the north slopes of the Hogs Back overlooking Flexford settlement to the very boundary of Flexford settlement at Flexford Road.

Further, the land allocated in Policy A46 contains unrestricted view of the Hogs Back, part of the Surrey Hills AONB. Recent case law establishes that views out from open land to an AONB are as important as views into land overlooked by an AONB. Surrey Hills Management Board (of which GBC is a member) has submitted proposals to Natural England for land currently with local designation Area of Great Landscape Value on the north slopes of the Hogs Back above Wanborough and stretching down to Flexford Road at the southern boundary of Flexford settlement to be subsumed into the AONB and is currently awaiting agreement for inclusion.

The future potential presence of in excess of 1,000 houses visible at the periphery of the AONB with associated urbanising infrastructure (e.g. roads, perpetual street lighting, general light pollution, loss of ancient hedges and trees etc.) would do great harm to the views into the AONB from the land between Normandy and Flexford and from the Surrey Hills AONB. There will be significant light pollution in winter months.

Thames Basin Heaths SPA

I object to the assertion in Policy P5 that the creation of SANG will protect the rare ground-nesting bird species on this SSSI and Natura 2000 site from major disturbance and predation introduced by the building of 1,100 dwellings that give
rise to hundreds of adults and children, vehicles, dogs and cats within 1 kilometre of this internationally important wildlife habitat.

The 2012/13 visitor survey report commissioned by Natural England on behalf of the Thames Basin Heaths Joint Strategic Partnership Board showed not a static or falling number but a 10% increase in visitor numbers since 2005:

- 66% cited dog walking as the main activity
- 80% of interviewed groups had dogs
- 67% of interviewed groups had dogs which were seen off lead
- 39% specifically visited the SPA site was because it was ‘close to home’
- the average distance travelled was just over 2.5 kilometres (80% by car)

Only 1% of visitors accessed the TBHSPA from the Normandy/Flexford direction, so the additional disturbance caused by the building and then occupation of 1,100 homes by 2,000-3,000 residents and 1,250 additional vehicles will be significant. Importantly, the prevalence of dog walking in the visitor survey suggests that the currently available SANG in the borough is ineffective in attracting those wishing to exercise dogs away from the TBHSPA.

Simply claiming that the 2012 visitor study data indicates success of the avoidance strategy in drawing people away from the SPA is no evidence at all. Where is data based on measurement of visitor numbers to the available SANG within Guildford borough? Where is the evidence that SAMM programmes have any impact on the behaviour of residents that are dog owners? Without it, a planning inspector has no means of finding the proposal of large-scale housebuilding at these sites sound. Natural England have admitted that no survey evidence exists of the effectiveness of SANG or SAMM programmes in directing dog-walkers away from TBHSPA in Guildford borough or any of the surrounding local authorities.

Creating 1,100 homes on Green Belt land between the settlements of Normandy & Flexford implies, on average, 340 dogs and nearly 290 cats (based on a survey of households carried out by a veterinary team at Bristol University in 2010 “Number and ownership profiles of cats and dogs in the UK” published in the Journal of The British Veterinary Association indicates 31% households own dogs and 26% households own cats); all housing to be located within 1 kilometre of the SSSI, for a dog owner, a 2-minute drive or 10 minute walk away. The survey showed dogs were more likely to be owned by rural households.

The proposed SANG schedule in the Infrastructure Delivery Plan, May 2016 (IDP, SANG 13 p84) gives indication of neither the physical size nor location of bespoke SANG for Policy A46 (LAA Site 368); it is estimated that this proposed open space will be unable to cater adequately for 340 additional dogs plus their accompanying owners and there will be significant ‘leakage’ onto the TBHSPA.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy A47 – Land west of The Paddocks, Normandy
I object to Policy A47
I object to the proposal that the land that contains the majority of an SNCI should be proposed for housing development.

In the section headed “Conserving and enhancing the natural environment” (section 11), it is stated inter alia that planning policy should protect and enhance valued landscapes and minimize impacts on biodiversity providing net gains in biodiversity wherever possible to halt the overall decline in biodiversity, by promoting “the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations……”.

The National Planning Policy Framework (NPPF) states that “The purpose of planning is to help to achieve sustainable development” and it describes three “dimensions” relevant to this aim: economic, social and environmental. The explanation for how the environmental aspect plays a role includes the statement “…..helping to improve biodiversity, use natural resources prudently…..” This is a quote from point 7 of the section dealing with achieving sustainable development, in the NPPF.

Guildford Borough Council (GBC) interprets the NPPF through their 'Policy I4' which emphasises the commitment to biodiversity stating: "The Council will conserve and enhance biodiversity and will seek opportunities for habitat restoration and creation, particularly within and adjacent to Biodiversity Opportunity Areas (BOAs)”. Proposals for development must demonstrate how they will deliver appropriate net gains in biodiversity. Where proposals fall within or adjacent to a BOA, biodiversity measures should support that BOA’s objectives. The Supplementary Planning Document (SPD) will set out guidance on how this can be achieved. European sites designated as Special Protection Areas (SPAs) and Special Areas of Conservation (SACs), National Sites of Special Scientific Interest (SSSIs), local SNCIs and Local Nature Reserves are all shown on the Policies Map or as subsequently updated. Policy I4 goes on to say that "Permission will not be granted for proposals that are likely to materially harm the nature conservation interests of local sites unless clear justification is provided that the need for development clearly outweighs the impact on biodiversity.”

The majority of the site covered by this part of the development is designated as an SNCI and lies within an area identified as a ‘Water Vole Alert Area’ as identified by the National Water Vole Database and Mapping Project in 2012.

It is shocking that an SNCI should be considered a suitable site for development, particularly given the statements in the NPPF (Para 109) and Policy I4. I find it a telling insight into the very low value that GBC places on biodiversity and wildlife.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy A49: Land rear of Palm House Nurseries, Normandy
I object to Policy A49
I object to the “insetting” of the land proposed for Policy A49. Proposing to ‘inset’ this site GBC will create an ‘island’ urban site would be created, removing the ‘openness’ of this Green Belt land confirmed in the judgement of the Planning Inspectorate and similarly judged in the evidence of the GBGS Vol.4. I propose this land should continue to be “washed over”.

Legal Precedent
I object to the removal of the land allocated to Policy A49 by removal from the Green Belt by “inset” under NPPF para 83 and 84. I believe that current case law militates against the removal of land by the re-drawing of Green Belt boundaries without the express presentation in the written Local Plan of the “exceptional circumstances” proposed to redraw the Green Belt boundary for the land in Policy A46. I draw attention to the following cases
• Gallagher Homes Ltd v Solihull Borough Council [2014] EWHC 1283 (Admin), Hickinbottom J
• IM Properties Development Ltd v Lichfield DC [2014] EWHC 2440 (Admin), Patterson J
• Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council [2015] EWHC 1078 (Admin), Jay J
In the Solihull BC decision in particular
“Exceptional circumstances are required for any revision of the boundary, whether the proposal is to extend or diminish the Green Belt. That is the ratio of Carpets of Worth.

Whilst each case is fact-sensitive and the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgment, what is capable of amounting to exceptional circumstances is a matter of law, and a plan-maker may err in law if he fails to adopt a lawful approach to exceptional circumstances. Once a Green Belt has been established and approved, it requires more than general planning concepts to justify an alteration.”
I contend that no “exceptional circumstances “ for such re-drawing of boundaries have been offered by GBC in the context of the Local Plan process, so how can residents judge the veracity of this proposal?

Contribution to ‘openness’ of the Green Belt
There is no legal definition of ‘openness’ but it is specifically expressed in NPPF para. 79 that appears as the first paragraph in “Section 9 Protecting Green Belt Land”; ‘openness’ is matter of opinion and that opinion is often expressed in the decisions of Planning Inspectors when assessing a planning appeal.

In the case of Palm House Nurseries the inspector agreed in 2011 that land to the west of Glaziers Lane exhibited ‘openness’. The inspector found in favour of the appellant on other grounds but the opinion on ‘openness’ in those judgements is evidence that this land around Palm House Nurseries is considered by the Planning Inspectorate to exhibit ‘openness’.

In the Green Belt & Countryside Study Vol 4, Land parcel H10 that contains the Palm House Nursery site was judged the fulfil three essential purposes of the Green Belt
• Checks sprawl of Normandy
• Prevents Normandy, Wood Street Village and Flexford from merging
• Assists in safeguarding the countryside from encroachment

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Policy A50 Whittles Drive, Guildford Road, Normandy
I object to Policy A50
I object to the “insetting” of the land proposed for Policy A50. By proposing to ‘inset’ this site an ‘island’ urban site would be created, removing the ‘openness’ of this Green Belt land confirmed in the judgement of the Planning Inspectorate and similarly judged in the evidence of the GBCS Vol.4. I propose this land should continue to be “washed over”.

Legal Precedent
I object to the removal of the land allocated to Policy A50 by removal from the Green Belt by “inset” under NPPF para 83 and 84. I believe that current case law militates against the removal of land by the re-drawing of Green Belt boundaries without the express presentation in the written Local Plan of the “exceptional circumstances” proposed to redraw the Green Belt boundary for the land in Policy A46. I draw attention to the following cases

• Gallagher Homes Ltd v Solihull Borough Council [2014] EWHC 1283 (Admin), Hickinbottom J
• IM Properties Development Ltd v Lichfield DC [2014] EWHC 2440 (Admin), Patterson J
• Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council [2015] EWHC 1078 (Admin), Jay J

In the Solihull BC decision in particular “Exceptional circumstances are required for any revision of the boundary, whether the proposal is to extend or diminish the Green Belt. That is the ratio of Carpets of Worth. Whilst each case is fact-sensitive and the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgment, what is capable of amounting to exceptional circumstances is a matter of law, and a plan-maker may err in law if he fails to adopt a lawful approach to exceptional circumstances. Once a Green Belt has been established and approved, it requires more than general planning concepts to justify an alteration.”

I contend that no “exceptional circumstances “ for such re-drawing of boundaries have been offered by GBC in the context of the Local Plan process, so how can residents judge the veracity of this proposal?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P5 Thames Basin Heaths SPA

I object to Policy P5 Thames Basin Heaths SPA

I believe that the Plan is unsound as the Habitats Regulations Assessment prepared for GBC does not take sufficient account of the impact seven proposed major housing developments within 5 km will have upon the Thames Basin Heaths Special Protection Area (TBH SPA) which is a European Site (as defined under the Habitats Directive and Conservation of Habitats and Species Regulations 2010 [as amended]).

Thames Basin Heaths Special Protection Area is a statutory site designated for its rare and vulnerable birds, specifically nightjar, Dartford warbler and woodlark under the EU Birds Directive.

This site also forms part of the Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC), a statutory site designated for its North Atlantic wet heaths, European dry heaths and peat bogs.

SANG (Suitable Alternative Natural Greenspace) is not additional; the sites identified or targeted are already green space. To create SANG will use existing Grade 2 and 3a agricultural or wooded land as recreation land in order to justify building on other green spaces. There is no actual increase in environmental protection; it is a policy designed to permit building on otherwise protected areas. SANG, in part used to prevent dogs and cats attacking nesting birds, must ensure that it is not using land which is adjacent to the special protection areas.

A Natural England survey in 2005 showed that more than 83% of visitors to the SPA arrived by car and that 70% of those had come from within 5km of its access point. A very large proportion of the TBH SPA visitors are dog walkers, many of whom visit a particular site on a regular basis. A follow-up survey in 2012 found that there was a 10% increase in visitors to the SPA since 2005. Habitats Regulations Assessment [HRA]

I object to the HRA and its Appendixes A, B and C I object to the omission of 2012/13 Natural England survey of visitor numbers to the TBHSPA report from the HRA. The HRA fails to list the 2012 Natural England Survey of Visitors to the TBHSPA as material evidence (Natural England Commissioned Report NECR136 Results of the 2012/13 visitor survey on the Thames Basin Heaths Special Protection Area (SPA), First Published 13 February 2014; Natural England Project Manager - Patrick McKernan, Natural England, Guildbourne House, Chatsworth Road, Worthing, West Sussex, BN11 1LD

Contractor - Footprint Ecology, Forest Office, Cold Harbour, Bere Road, Cold Harbour, Wareham, BH20 7PA).

The 2012 NE visitor survey reports a 10% increase in visitor numbers. This is neither considred nor critically appraised as a contribution to the analysis of success or failure of the TBHSPA Avoidance Strategy 2009-2014 and the implications for Policy P2, P5, E8 and E9. The HRA fails to assess whether SANG and SAMM current policies and programmes are effective, either independently or in combination, in attracting visitors, cross-country cyclists and dog-walkers away from TBHSPA. On enquiry, Natural England admitted they have no such survey evidence for TBHSPA SANG or SAMM programmes.

The HRA fails to assess in detail, with associated numerical calculations and a described methodology that can be independently verified, the cumulative potential impact on disturbance and predation rates within TBHSPA by the introduction of domestic pets (dogs and cats) from new dwellings; the introduction of over 8,000 dwellings within the 400m-5km mitigation zone will give rise to over 19,000 human inhabitants (ONS 2.4 people per household).
A survey of households carried out by a veterinary team at Bristol University in 2010 “Number and ownership profiles of cats and dogs in the UK” published in the Journal of The British Veterinary Association (Veterinary Record 2010;166:163-168 doi:10.1136/vr.b4712 Authors: J. K. Murray, BScEcon, MSc, PhD1, W. J. Browne, BSc, MSc, PhD1, M. A. Roberts, BVM&S, MRCVS2, A. Whitmarsh1 and T. J. Gruffydd-Jones, B VetMed, PhD, MRCVS1) indicates 31% households own dogs and 26% households own cats. Dogs were more likely to be owned by rural households.

Applying this analysis for all new housing at the listed strategic housing sites in the draft Local Plan within the 400m-5km mitigation zone of TBHSPA (in total 8,000+ new homes), the cumulative impact of dog ownership (up to an estimated 2,500 new dogs and 2,000 new cats within 5 km of TBHSPA) with associated dog-walker incursions on the rare bird species habitat of the TBHSPA will be a devastating increase.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/3163  **Respondent:** 11011969 / Diana Gibson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send and Ripley. A35

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/3161  **Respondent:** 11011969 / Diana Gibson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more vehicle movements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3160  Respondent: 11011969 / Diana Gibson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development at Garlick’s Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks’ notice and without any prior consultation and is not required in terms of housing need either for the village or the borough. The Garlick’s Arch site is attractive open countryside and part of the permanent Green Belt which is protected under the National Planning Policy Framework. It also represents unrestricted sprawl. The site has a particular conservation sensitivity since it is covered in ancient woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600. The site is also subject to flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3159  Respondent: 11011969 / Diana Gibson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available.
I object to the proposed new interchange onto the A3 at Burnt Common. It would result in the A247 (Send Road) being gridlocked all day. There are no proposals to improve or widen this road. Send will be the through route to Woking for traffic leaving the M25 at Junction 10, the new development of 2,000 houses at Wisley and also the new development of 2,000 houses at Burpham. I further object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3162  Respondent: 11011969 / Diana Gibson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6893  Respondent: 11011969 / Diana Gibson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6894  Respondent: 11011969 / Diana Gibson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/6890  **Respondent:** 11011969 / Diana Gibson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

I wish to raise the following objections to the draft local plan:

I object to the removal of Send and Ripley from the Green Belt because the villages and their countryside provides a necessary buffer between Woking and Guildford. One of the purposes of the Green Belt is the prevention of merging of towns and settlements thereby creating unrestricted sprawl. If these villages were removed from the Green Belt in time there would be continuous development between Woking and Guildford. 70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries. They have not been shown by Guildford Borough Council. I object to Policy P2 green belt which states that “the general extent of the Green Belt has been retained.” This is completely false.

I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/6891  **Respondent:** 11011969 / Diana Gibson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of Send and Ripley from the Green Belt.
I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need. I object to all proposals to build on the Green Belt at Send, Ripley and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6895   Respondent: 11011969 / Diana Gibson   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1056   Respondent: 11011969 / Diana Gibson   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. There is certainly no local need in Send to expand the village by over 25% which it would with the proposal to build an additional 485 houses in the village. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially from the previous draft local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1767  Respondent: 11012097 / John & Jean Waters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the development of over 2000 houses at Wisley Airfield. The impact this will have on our villages will be huge and our infrastructure such as it is, will be unable to cope with the extra traffic.

Overall, it is extremely disappointing that all the local villages will be subject to such development changes and our Green Belt will be lost for ever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1710  Respondent: 11012097 / John & Jean Waters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the plan to build a town on the site of the former Wisley Airfield, one of the green belt areas on which a large scale development is proposed. This would lead to a great increase in traffic close to the busy A3 road and a very real threat to the beautiful and renowned RHS Garden at Wisley because of higher levels of pollution. The wildlife habitat of the former airfield would also be destroyed and lost for ever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to the plan to build on the site of Thatchers Hotel. The A246 main road at this point is already severely congested, especially where the road bends round sharply with fast-moving traffic. A hundred or so extra cars joining the road here in order to access the station, schools, shops and the A3 will cause much added congestion and the risk of serious accidents.</td>
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<th>Comment ID: PSLPP16/3743  Respondent: 11012097 / John &amp; Jean Waters  Agent:</th>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>Finally, if this Local Plan is adopted, this whole beautiful area will be completely desecrated and the character of our villages destroyed and lost to us and future generations for ever.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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The infrastructure in the Horsleys is already overloaded. Local schools are full, medical facilities are stretched and our narrow roads cannot cope with the increased amount of traffic. If we take into account all the new properties proposed our roads will simply not be able to manage the extra volume of traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3742  Respondent: 11012097 / John & Jean Waters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Furthermore these two villages are typical of the beautiful and picturesque countryside of Surrey where many roads are narrow, with little or no pavement. Walking along these is already unsafe, with cars and lorries dangerously close to pedestrians, whether these are families with young children or elderly people using walking aids. The increase in traffic caused by building on the site near Horsley station at one end of the village and on the site of Thatchers Hotel at the other end will greatly exacerbate this danger.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3741  Respondent: 11012097 / John & Jean Waters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object strongly to the plans to take the two Horsley villages out of the Green Belt, especially as there are no circumstances so exceptional to warrant such drastic and devastating action.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3809  Respondent: 11012097 / John & Jean Waters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to Guildford Borough Council’s drastic plan to remove both East and West Horsley from the Green Belt and the “exceptional circumstances” required before taking this action have not been demonstrated.

I strongly object to the extension of the boundaries of the Settlement areas of the Horsleys. No sound reasons have been given for the proposed changes, which seem to be aimed solely at increasing the land available within the settlements for future additional development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6700  Respondent: 11012129 / William Lawrence  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The proposed development at Gosden Hill Farm is clearly unsustainable. It does not promote a positive improvement in the quality of the natural environment, or an enhancement of the natural and local environment by protecting and enhancing valued landscape.

There will be an unavoidable loss of bio-diversity with no recognition of the wider benefits of a sustainable ecosystem and does not provide net gains in biodiversity. This development will create a significant loss or deterioration of irreplaceable habitats.
This is evidenced in the massive loss of biodiversity associated with previous developments in the locality, (Weylea, Weybrook, etc.).

This proposal does not establish coherent ecological networks that are resilient to current and future pressures. There is no plan for the creation, protection, enhancement and management of adequate networks of biodiversity and green infrastructure. Nor does this aim to conserve and enhance biodiversity by locating to an alternative site with less harmful impacts.

NPF118. NPPF114. NPPF9.

1. The plan does not empower local people to shape their surroundings and there is little regard for local or regional issues such as excessive traffic, congested traffic and the associated loss of amenity. The planned schools, railway station, park and ride and retail centre will clearly draw large volumes of motor vehicles through the village of Burpham, which is already well above capacity to a point of daily gridlock.

There will be no improvement in the conditions in which people live, work and take leisure. The massive increase in traffic with the associated air pollution will cause a catastrophic reduction in air quality. Indeed, there is clearly overwhelming local opposition to the Gosden Hill Farm development in particular, and the Guildford Draft Local Plan in general.

1. The plan does not protect or recognising the intrinsic character and beauty of the countryside or support existing communities. Gosden Hill Farm is the last of many working farms left in the village of Burpham. Its loss will impact gravely on the nature and community of the village. This plan will remove land from the rural economy and does not pay regard to future agricultural need for productive farmland. NPPF 17.

There has been no taking into account the economic and other benefits of this agricultural land, and no assessment of future needs. NPPF112.

1. This plan will encourage the unrestricted sprawl of large built-up areas. It will effectively merge villages and destroy the intrinsic identity of communities. It will remove any safeguards protecting the countryside from encroachment. NPPF 80.

1. There has been no Strategic Flood Risk Assessment or assessments of the physical constraints on land use. NPPF35

1. This plan does not encourage the effective use of land by reusing land that has been previously developed and has lesser environmental value. Recent developments within Guildford town centre have replaced land originally used for housing with retail, business and car-parking usage. There has been no genuine assessment of all available brownfield land within the borough. The Gosden Hill Farm site uses virgin quality farmland.

1. There is no plan for reducing pollution or minimising its effects including the cumulative effects on health, the natural environment and general amenity on the local and natural environment. The large increase in vehicle traffic, including delivery lorries, and congested traffic, caused by this plan will cause a dramatic increase in both air and noise pollution. The School, housing and retail centre will also generate vast amounts of light pollution. NPPF110, NPPF120.

1. There has been no genuine assessment of infrastructure needs nor forecast for future demands. There is no proposal for a decentralised energy supply or promotion of energy from renewable and low carbon sources. NPPF96.

1. This Plan does not take any account of longer term climate change, including factors such as flood risk, water supply and changes to biodiversity and landscape. There has been no management of risks through suitable adaptation measures, with no planning of green infrastructure.

There is no plan for a transition to a low carbon future in a changing climate. All routes are essentially for motor vehicles. There is no genuine plan for alternative transport systems (e.g. trams etc.) to link with the town centre. NPPF 99.

Essentially the Guildford Draft Local Plan does not provide a considered proposal for sustainable development.
The Gosden Hill development is ill conceived and its location has been chosen for reasons of ownership rather than suitability. Burpham and Merrow have already had considerable development during the late twentieth century, losing many of their traditional farms to housing and retail. This area has already had considerable development and the proposal will cause an unbalanced expansion of Guildford causing an excessive load on the local infrastructure.

This plan will destroy the identity of Burpham village, other existing villages, and their communities by their merging into a suburban sprawl.

The Bio diversity of Burpham is already in sharp decline and has had no proper assessment. This proposal to develop its last working farm will destroy much that remains with no effective mitigation proposals.

There is no proposal to mitigate increased air, water, noise and light pollution from motor vehicles, commercial development and domestic dwellings. Neither are there proposals to mitigate any impact on wildlife from vehicles and their associated infrastructure.

The infrastructure has not been considered holistically. The dramatic increase in road networks will not solve the traffic management problems, but rather add to them.

There are no pragmatic proposals to provide energy (e.g. solar/wind farms) for this development nor to effectively deal with the extra generation of waste including water and refuse.

The basis on which this plan is conceived is far from robust. No genuine assessment can be achieved from these nonspecific proposals. There has been little accurate assessment of current bio diversity, air quality, water pollution, drinking water availability, waste disposal capacity, energy needs and energy generation capacity.

For these reasons the Draft Local Plan should be re-considered. New sites explored and alternative solutions sought.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
1. Since the release of the Draft Local Plan there have been substantive changes to borough infrastructure, particularly in relation to Burpham, where traffic volume, flows and future predictions have not been assessed.
2. There has been no accurate assessment of pollution levels, particularly in relation to traffic. Since the release of the Draft Local Plan, Burpham has especially seen a massive increase in HGV use, traffic volume and congestion. There has been no corresponding assessment of the impact of the Gosden Hill Farm development upon this activity and no assessment of present and future pollution levels, particularly in reference to WHO guidelines.
3. There has still been no meaningful assessment of current bio-diversity within the borough nor has there been any assessment of the impact of housing and infrastructure development upon this.
4. There has been no accurate feasibility study for the proposed Sustainable Movement Corridor (Burpham). Recent developments have ignored government guidelines and there is insufficient space for this proposal. This project could not be completed without massive use of compulsory purchase powers. (Which Surrey County Council have categorically stated that they would not use).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/266  Respondent: 11012129 / William Lawrence  Agent:


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

Generally, this plan is still fundamentally unsound, unsustainable, and contains either data that is erroneous and misleading or simply missing. It does not provide a considered proposal for sustainable development.

The Gosden Hill development specifically, is ill conceived and its location has been chosen for reasons of ownership rather than suitability. It is a ill informed ‘knee-jerk’ solution with no serious consideration of alternatives.

The basis on which this plan is conceived is far from robust. No genuine assessment can be achieved from these nonspecific proposals. There has been little accurate assessment any of the relevant criteria; traffic, utilities, pollution and the environment.

This revised Draft Local Plan should be totally rejected. Its unimaginative solutions are unworkable and not fit for the twenty first century. New holistic solutions need to be addressed, accurate assessments made new and innovative options explored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<th>Comment ID: PSLPA16/3419</th>
<th>Respondent: 11012161 / Wendy Gathercole</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/176</th>
<th>Respondent: 11012161 / Wendy Gathercole</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26</td>
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We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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| Comment ID: PSLPS16/6643 | Respondent: 11012161 / Wendy Gathercole | Agent: |
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.
• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of
the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of
which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
• I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties
there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and
many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five
storeys high and a population density higher than most London boroughs.
• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The
development is too isolated, and even within the development itself too spread out to anticipate a
reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an
estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas,
exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths
and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A
further planning application at RHS Wisley (with a significant increase in visitor traffic) and a
proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3
junction as well as local roads. No development can proceed without significant infrastructure
enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due
to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with
the proposed increase in passenger traffic and car parking is already at capacity
• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the
site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest
(SSSI) and Site of Nature Conservation Interest (SNCI).
• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the
borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will
exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the
acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
• I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced
through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1)
access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish
to see both the historic features of the village maintained and the village’s green spaces, including the FWA/
TFM, protected.
• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) -
where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL)
planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning
Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows),
Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13951  Respondent: 11012161 / Wendy Gathercole  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13952  Respondent: 11012161 / Wendy Gathercole  Agent:
I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13953  Respondent: 11012161 / Wendy Gathercole  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13948  Respondent: 11012161 / Wendy Gathercole  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13949  Respondent: 11012161 / Wendy Gathercole  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1625  Respondent: 11012161 / Wendy Gathercole  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6084  Respondent: 11013153 / Peter Carter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A36
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Loss of agricultural land

1. The proposals, in particular in relation to Blackwell Farms would remove a large proportion of the working agricultural land that is proximate to Guildford. This is important both for the food it produces but also for its importance in providing an educational gateway for children living in the town to ensure they understand how their food is produced.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12481  Respondent: 11013153 / Peter Carter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Pressure on services

1. Hospitals – The current services at the Royal Surrey appear over-stretched. Significantly increasing the size of population served will further worsen both services and access. Even at this point in time getting a car parking space at the hospital is very difficult during visiting hours.

2. Schools – The current school system in Guildford is materially over-stretched, hence the requirements over the past few years to expand school sites. It is not clear within the proposals that there is sufficient consideration being given to secondary school places in particular. Even with the revised changes the reality is that the schools proposed are not in the right place for demand and lack a clear strategic direction. The Council’s policy in this areas has been flawed over the past few years and the revised plan risks creating a significant continuation of the provision of lower quality schooling for many parts of Guildford with the consequence that demand is not, and will not, be evenly spread – a situation which materially increases traffic volumes and reduces community sentiment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12480  Respondent: 11013153 / Peter Carter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Infrastructure.

1. Roads – The overall road network within Guildford is already hugely challenged. In particular the A3, which will be a major feeder road for the expansion in the West of Guildford will be unable to cope at peak periods. Guildford already can’t cope when there is a problem on the A3, adding thousands of additional cars to this route will make it materially worse. It is also likely that the A31 will also be overburdened. The evidence for this over-burden is clear. Already in the period since the prior town plan there have been a number of fatalities and serious injuries caused by traffic volumes in the town centre. Increasing road usage will exacerbate this situation. Finally, the road network that the Blackwell Farm Site will be dependent on also feeds the hospital, a part of the road network just off the A3 and suffering from existing capacity problems at peak periods. This is also the same network that feeds the hospital. At peak periods the additional traffic will literally put people’s lives at risk. Even excepting this the evidence provided by the plan suggests that in the evening rush hour (with all the change being considered) traffic volumes will actually slow.

2. Rail – Guildford is hugely dependent upon the rail network, in particular for travel to / from London. Even at weekends the current rail provision is such that it can be difficult to get a seat. On weekdays, particularly between 7 and 9 am and between 5 and 8pm it can literally be impossible to get a seat. While further increases in capacity and frequency are to be welcomed, the reality of these changes is that they are required now with the current volume of passengers – I travel regularly on these trains and passengers fainting as a consequence of the conditions is a relatively frequent occurrence. Adding thousands of new homes, and at least hundreds of new commuters without the development of a substantially new rail network – including new terminus or significant expansion at Waterloo (one of the major constraints to rail volume) will leave Guildford woefully under-served by its rail connections. It is also apparent that some proposals exist to increase population along the train route between Portsmouth and London – it is not clear that the impact of all of these changes at the same time have been considered on the capacity changes.

3. Town centre access – As discussed the current draft local plan, with its anticipated reduction in car-parking and traffic volumes is completely incompatible with the proposals in the local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/12483</th>
<th>Respondent: 11013153 / Peter Carter</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4</td>
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Loss of recreational opportunities

1. Removing such a large area of local open space, with its associated footpaths and bridleways will reduce the opportunities for people to access the surrounding countryside.

Impact on Wildlife

1. The development will have a material impact on local wildlife. This will include the implications for rare plant and bird species as well as deer, who currently regularly access this area of west Guildford through the area around Surrey University.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12484  Respondent: 11013153 / Peter Carter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Loss of locally and nationally important views

1. The chalk ridge of the Hogsback provides important views of the local area – and in particular the Surrey Hills Area of National Beauty. The reason for this designation was its local importance. Including a significant swathe of this in the local plan for development would dramatically impact these views and the views of Guildford cathedral.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12482  Respondent: 11013153 / Peter Carter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Green belt expansion

1. The proposed area for the expansion in West Guildford is green belt. The underlying thesis behind a green belt designation is that it should be preserved for the future. Re-classifying sites as green belt in order to compensate with the removal of green belt status elsewhere is at least inappropriate and disingenuous. More realistically it is bordering on fraudulent – the designation of the site as green belt is understood by the general population (or even the man on the Clapham omnibus in legal parlance) to be a long-term designation not given or removed lightly. This proposal treats the designation with disdain and when the wider population understand what has been done there will be general shock and resulting contempt for the town planners and councillors. This proposal is completely inappropriate and particularly for sites such as Blackwell farm which are sites of exceptional beauty and home to varied wildlife – it is simply not possible to lift and drop this flora and fauna into a new area without significant damage being done to it. The fact that the university is supportive of expansion, thereby making this site easier to develop, does not mean that the simplicity of approach should over-rule the impact of the development on this special area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12479  Respondent: 11013153 / Peter Carter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the draft local plan. I object on the basis of:

1. The entirety of the plan – the proposed scale of expansion it contains, the continued absence of supporting infrastructure and the complete incompatibility of the approach with Guildford’s current and traditional state;
2. In particular the proposed expansion on the West of Guildford, including the Blackwell Farm Site and other associated development such as the cathedral.

I also note that it is appalling that what appear from the information provided to have been only very minor changes to the prior plan have been made yet you insist on requiring fresh objections – the reality is that the plan recently proposed is not materially changed from that provided in 2014 and consequently all or almost all objections to that plan should remain.

The core reasons for my objections are set out below (for the avoidance of doubt all of these apply to the West of Guildford expansion as well as some applying to the overall plan) as follows:

Scale of expansion.

1. The proposed scale of expansion is incompatible with Guildford as a town and will dramatically change its character and the demands placed upon it;
2. The scale of expansion in absolute terms is too significant for a relatively modest town and is well beyond that which is required. The evidentiary support provided does not justify the scale of development proposed.
3. The relative scale of expansion vs. that proposed by other areas such as Woking – if the demand for such expansion is there then it should be met on a balanced basis across the region; and

4. The incompatibility of this plan with the town centre and the proposed plan. The town centre plan suggests that there will be less access to the town centre with less parking and a lower capacity for traffic. Implementing this local plan at the same time as the changes contained within the town centre plan is a recipe for complete chaos. While the revised plan refers to changes in the mix of transport, and hopefully there will be some, this will undoubtedly be insufficient to reduce overall traffic volumes in what is already an over-stretched town. Supply side changes are not going to be sufficient to cope with the level of increased demand proposed by the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12485  Respondent: 11013153 / Peter Carter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Inadequate and mis-focused consultation.

1. While extensive efforts have been made to communicate the content of the town centre plan to residents the same is not true for the local plan. Indeed the current proposals as set out online provide a picture of a well-developed plan with exceptional support and significant changes from the prior plan. This is simply not the case. The detailed information underlying the projected demand for population growth has been requested repeatedly and Guildford Council has a legal right to access it yet this has not been provided. This proposal is not materially changed from the prior proposal, instead this is an exercise which combines good soundbites with a gradual effort to wear down the local population – having conveniently sidelined the plan’s changes over the recent local election period. This is not appropriate and in reality is an exercise in undermining local democracy. The plan is not appropriate and has only changed at the margins.

2. In addition the form and content of the document makes it virtually impenetrable for an ordinary person to access it. Producing a complex document, a summary of changes which relies on extensive reference to varied supporting documentation and with a range of meaningless soundbites and terms which only town planners are able to interpret does not create an accessible plan. Indeed both my wife and I have numerous post-graduate qualifications, and my wife even has a Geography degree yet the summary provided by you left us struggling to understand the changes and meaning of the document. The approach taken makes it very difficult for even the well-educated to read, interpret and assess the proposals in a sensible timeframe.

3. In short the consultation process has provided over-complex information on the local plan and is an attempt to grind objections down. It remains wholly inappropriate and should be completely re-thought from the ground up, rather than subject to variation at the margins – as has been the case. If this was activity undertaken by a bank then there would be calls for a public investigation and potential action for mis-selling – I fail to see why failing to consult properly in the public sector over a matter of this importance should be treated any differently.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I am writing to object to the proposed Guildford Local Plan. This follows my prior letters – which do not appear to have been adequately addressed.

The points below are of general applicability to the plan AND I also specifically reiterate them in relation to the proposed development of the Blackwell Farm area [a26 and 4.1.9]:

1. The development does not address the needs of Guildford, it is excessively heavy and will largely be targeted at encouraging new residents to move to Guildford rather than addressing the housing needs of existing residents
2. The infrastructure within Guildford will not be able to cope [2.14a]:
3. The plan will materially increase the population, rail access to London and the A3 already cannot cope and will be subject to significant further increases in stress as a consequence
4. The Blackwell Farm site will increase traffic at an existing pinch point near the hospital, an unworkable situation AND potentially life threatening if it slows emergency access. I understand the existing traffic levels in this area are already in excess of requirements by local planning inspectors, a matter which will significantly worsen
5. The proposed additional rail stations do not address the major constraint on rail – access to London and indeed the development will make this worse by encouraging Guildford Town Centre station as a hub.
6. The plan does not make adequate provision for already over-burdened schools, doctors and the hospital to cope with the additional population
7. The consequence of the above is that the town will see increased pollution, both in the town centre, as population increases generally, and specifically around the hospital and Blackwell Farm from a combination of increased traffic on the A3, access to the Hospitals, university, sports park and business park. This may well reduce health around Guildford and will likely reduce the health benefits young people see associated with use of the sports park – which directly neighbours both the farm site and the A3. It will also have knock on implications for Compton, which will see traffic and pollution both from traffic on the A3 and from vehicles using it as a shortcut [a26 key considerations 7]
8. The area around Blackwell Farm and across to Compton on the south side of the downs provides much needed greenbelt, and has significant natural resources / wildlife. The development would irreparably damage the greenbelt around Guildford generally and specifically remove this rare and treasured resource from Blackwell Farm. Additionally it does not specifically set out the rationale / costs and benefits of alternative options for development [P1 para 4.3.8 and S2 para 4.1.9]

Many thanks – for the avoidance of doubt I find it ridiculous that I am being asked to comment for the third time on what is at its core the same plan – I would be surprised if the Council’s decision to continually reissue a relatively unamended plan were not subject to judicial review given it is clearly a tactic to wear down individual respondents.
I write to detail my objections to the Guildford Borough Council (GBC) Local Plan 2016.

My comments are frequently linked to my own locality, since I clearly have most experience there. However, it seems that GBC wishes to pursue a policy of forced growth across the whole borough, without the support of the residents, based on the ineffective experiences of objecting to the GBC Local Plan 2014.

Whilst I am a resident of West Horsley, my property shares borders with East Horsley, and my comments often therefore refer to both villages, since proposals to both are pertinent.

**Unbalanced Development**

Having reviewed the areas for proposed development I object to the unbalanced distribution of the sites across the borough. The sites seem to be focused on the north eastern side of Guildford, swamping existing rural villages and destroying large areas of countryside without planning for the necessary infrastructure that everyday life requires. In particular, an increase of 35% housing in West Horsley is excessive.

**Loss of Green Belt**

I wholeheartedly object to the use of current Green Belt land for development via the plan. The establishment of Green Belt was for the protection of the countryside for future generations. There has been no exceptional circumstance established for the removal of, or alteration to, boundaries of East or West Horsley from the Green Belt.

In addition GBC claims in its own publication "About Guildford" Summer 2016 (pg4) that following feedback the total number of development sites on green belt has been reduced. This is most certainly not the case in East and West Horsley.

**Traffic and road network**

The roads in and around East & West Horsley are in poor condition and very narrow in places, and unable to support the current level of traffic using them. They are certainly not capable of increased usage and I object to any development that generates additional traffic. This is supported by the recent incident of a lorry getting stuck under the railway bridge at Horsley station, where Ockham Road North and South meet. The incident caused disruption to the rail system and roads for multiple days. It would be dangerous and foolhardy to develop the area A39, noted on Map Horsleys (East Horsley) page 348 of the plan, creating additional traffic on such constricted roads.
In addition my journey to work at The Royal Surrey County Hospital using the A3 is frequently hampered by slow or stopped traffic, particularly around the Burpham area. I object to excessive development within the Borough when the main roads are unable to support the existing level of traffic.

Parking

There is insufficient parking at the West Horsley parade of shops, West Horsley Village Hall, East Horsley Village Hall, Horsley station and Station Parade in East Horsley. I object to the excessive local development proposed in the local plan, both around East and West Horsley villages and the Wisley Airfield site which would compound the matter due to increased numbers of car users.

Flooding

I object to development that increases waste water in East and West Horsley. The water drainage systems in the area are unable to cope with the current level of waste water. The local roads are often flooded in winter, and increasingly at other times of the year also. My daughters walk along Ockham Road North to access the station for their journey to school. During periods of wet weather I am often forced to drive them in the car, as the road is so flooded it becomes impassable on foot. Development that increases both traffic and waste water in this area (such as site A39, pg348) would have an extremely detrimental effect.

In addition my back garden, which borders the proposed site A39 pg348, is often flooded in winter, and with a recent period of wet weather even in June. The winter streams are not able to cope with the current amount of water from the field and I object to any development of this site that will increase run off.

Schools

The Raleigh School is already at capacity, and unable to accommodate more children. This is also the case for the Howard of Effingham. I object to development in East and West Horsley and Wisley Airfield that will create additional schooling requirements.

Medical facilities

The current medical facilities at Kingston Avenue in East Horsley are at capacity and difficult to access. I object to any development that increases demand on these services.

In conclusion, the GBC Local Plan 2016, does not provide the community with a plan that fits with the needs of its residents, and should be dismissed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/649  **Respondent:** 11013601 / Lawrence Hodge  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1941  Respondent: 11013761 / Daniel Morgan Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I request that my comments are shown to the local planning inspector on the below sites and issues:

I OBJECT to Send Village being removed from the green belt. I purchased my house on the basis of the green belt areas and the permanency of this. There are no circumstances in which this should be abandoned. Send's green belt is an essential buffer between Woking and Guildford.

I OBJECT. To the 45 houses at Clockbarn Nursery, due to inadequate access and traffic volume.

I OBJECT to building 400 houses and industrial space at Garlick's Arch. The site floods and is covered by ancient woodland. There are brown field sites that need development instead, and industrial space in this location is not appropriate.

I OBJECT to the Send Hill site of 40 houses and 2 travellers' pitches. Is it totally in appropriate due to the narrow width single access country road with insufficient access. Any development would spoil the high amenity area set in countryside. I also object as this site was not included within the first consultation and therefore should not be included in this second follow up, without starting the process from the start. This update consultation should be the first but refined, and should not include fresh sites.

I OBJECT to a new interchange with the A3 at burnt common. Send would then become a main road for access to the a3 over and above what is in place already. I live on Send Barns Lane so suffer the road as is, any further congestion be and pollution would hugely impact on our lives and house value. Together with the new sites a proposed at Wiseley Airfield, Gosden Hill and Blackwell Farm would be excessive.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/3686  Respondent: 11013761 / Daniel Morgan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

> I OBJECT to Send Village being removed from the green belt. I purchased my house on the basis of the green belt areas and the permanency of this. There are no circumstances in which this should be abandoned. I regularly walk with my children round the local countryside, along footpaths and through fields. We all enjoy the scenery, the wildlife and the tranquility it provides. We moved here because we wanted to live in a village setting with countryside. Planning such vast building works would ruin the landscape, destroy habitats and tarnish the very essence of what makes Send a lovely place to live. Send's green belt is an essential buffer between Woking and Guildford.

> I OBJECT to the 45 houses at Clockbarn Nursery, due to inadequate access and traffic volume. This is right opposite a very popular and well used play park; added traffic in an already busy location with poor visibility would pose a serious threat to pedestrians - especially children around the park and shops who would find it difficult to cross Send Road safely.

> I OBJECT to building 400 houses at Garlick's Arch. The site floods and is covered by ancient woodland. There are brown field sites that need development instead, and industrial space in this location is not appropriate. The number of houses proposed would flood the existing, already overstretched services. The Villages Medical Centre is already very busy and the local primary school is just recovering from a period of huge change and has finally received a positive Ofsted inspection. As a primary teacher myself, I would be concerned about the demands such an increase in intake would place on this school.

> I OBJECT to the Send Hill site of 40 houses and 2 travellers' pitches. Is it totally inappropriate due to the narrow width single access country road with insufficient access. Any development would spoil the high amenity area set in countryside. I also object as this site was not included within the first consultation and therefore should not be included in this second follow up, without starting the process from the start. This update consultation should be the first but refined, and should not include fresh sites. The presence of travellers sites would significantly impact the value of surrounding housing - Send Hill homes are premium and this would be negatively affected by travellers' pitches so close by.

> I OBJECT to a new interchange with the A3 at Burnt Common. Send would then become a main road for access to the a3 over and above what is in place already. I live on Send Barns Lane so suffer the road as is, any further congestion and pollution would hugely impact on our lives and house value. Currently, large loads travelling on the road cause the whole house to shake. I regularly walk my two children to and from the park and school - the pavements are very narrow in places and the traffic often includes large lorries, heavy loads and at times, traffic travelling at speed, despite the 30mph limit. It is not safe and further traffic would increase the danger to pedestrians. Together with the new sites proposed at Wiseley Airfield, Gosden Hill and Blackwell Farm, this would be excessive.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1943  Respondent: 11013889 / Richard Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North
Date: June 2016

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor...
stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5. I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9. I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10. I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I am writing in response to the proposals set out for West Horsley in the 2016 Guildford Draft Local Plan. My concerns focus upon the strains that would be imposed upon an already creaking infrastructure in this area, and the erosion of the Green Belt.

The detailed arguments relating to the impact upon the various elements of the infrastructure have been well rehearsed elsewhere. Suffice it to say that transport (road, rail and parking), medical, educational and shopping facilities are already under considerable strain. The increased volumes of traffic that would arise from the proposals have the potential to generate considerable hazards to local schools, pedestrians and junctions. The Raleigh School is oversubscribed and the Medical Centre is inundated. The addition of a significant number of new dwellings to the area would be unsustainable.

As I understand it the Green Belt may only be challenged in exceptional circumstances. No-one would view building on the Green Belt in West Horsley an exceptional circumstance when there are viable options for additional housing throughout the borough.

The scale of the proposed developments in the Horsleys would have a detrimental impact on the rural characteristics that define life in this Surrey village. Any development needs to be proportionate in scale and not be at the expense of the quality of life of those of us already resident here.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I am writing in response to the proposals set out for West Horsley in the 2016 Guildford Draft Local Plan. My concerns focus upon the strains that would be imposed upon an already creaking infrastructure in this area, and the erosion of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13986  Respondent: 11014145 / John Brown  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The detailed arguments relating to the impact upon the various elements of the infrastructure have been well rehearsed elsewhere. Suffice it to say that transport (road, rail and parking), medical, educational and shopping facilities are already under considerable strain. The increased volumes of traffic that would arise from the proposals have the potential to generate considerable hazards to local schools, pedestrians and junctions. The Raleigh School is oversubscribed and the Medical Centre is inundated. The addition of a significant number of new dwellings to the area would be unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13988  Respondent: 11014145 / John Brown  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As I understand it the Green Belt may only be challenged in exceptional circumstances. No-one would view building on the Green Belt in West Horsley an exceptional circumstance when there are viable options for additional housing throughout the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3537  Respondent: 11014369 / Geraldine Wright  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have a number of concerns about the draft local plan which has been put out for consultation by the Guildford Council and in particular, I object to the number of houses which are planned both in terms of the actual number and the fact that 65% of these are to be built on land which is currently in the Green Belt.

I understand that the Housing and Planning Act states that a site, once identified in the Local Plan, is assumed to have permission to go ahead in principle, thus stopping normal planning restrictions at a later date.

The current proposals include at least 148 houses in East Horsley and 385 in West Horsley. Both villages will be taken out of the Green belt leaving both vulnerable to future development. This is in addition to the proposed 2068 houses on Wisley Airfield, 400 homes at Burnt Common and 2000 houses at Gosden Hill Farm.

These proposals, if accepted, will cause huge pressure on road, parking, trains, education and medical facilities. Royal Surrey Hospital is already at breaking point. Primary and Secondary Schools are over-subscribed. Where will the children from these new houses go to school and on to university? I am a commuter and with the additional two coaches it is now possible to ensure a seat at Horsley – those at Oxshott are not so lucky, but returning in the evening it is often impossible to get on the train at Waterloo at 7.00 pm and I have to wait for another train. This is not to sit down – merely to get on the train without fainting. Our medical centre is one of the best in the area but appointments are not easy to book. The proposed local plan will put an incalculable burden on these facilities. The Royal Surrey Hospital is similarly stretched to its limits. How will these new residents be treated?

If one considers that each home will have at least one car and most will have two or more, there will be approximately 5,000 additional cars in the vicinity of the Horsleys alone. How will the new commuters get to the station and park? The car parks are already full and there is no more parking land available.

The roads in and out of East and West Horsley are not able to cater for increased flow of traffic. The village life we have come to know would be totally removed by the imposition of a one way system which would be the only way to deal with this additional traffic burden.

The Government is already concerned about pollution, yet I do not see how the increase in volume of traffic can do anything other than pollute the environment.

Flooding is an additional problem. The site behind Ockham Road North is already a flood risk area and standing water collects after any heavy rain. Building will only exacerbate this problem.

**The overall loss of green belt land is one of my greatest concerns.** Once the land is built upon it can never be reclaimed. Our countryside will disappear. **The Local Plan must take account of these issues and reject further development of the Horsley’s.**

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/747  Respondent: 11014369 / Geraldine Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I have been offered the opportunity to comment on the Guildford Borough Proposed Local Plan and to the continued inclusion in the plan of the Former Wisley Airfield.

I have many objections to the draft Local Plan which can be summed up as follows:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is considerable brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. There were a number of Election manifesto promises to the electorate which have been ignored in this regard.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No
development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity. Commuter trains are already at bursting point. The recent addition of two coaches (from 8 to 10) have done little to ease the congestion and it is often impossible to board the Horsley train at Waterloo. Passengers are regularly helped off the train en route because of overcrowding on the inward journey. Even allowing for a small proportion of occupants of the proposed development being commuters would put an impossible burden on the existing services.

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two

10) responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces.

Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

11) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
1. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

2. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

3. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

4. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations. There should be a clear statement as to how this has been allowed to happen.

5. I object to the extension of the plan period by 1 year as it has not been identified as a major change

6. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

7. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes. What is being done in this regard?

8. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

9. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact

10. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)

11. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building. All the arguments with regard to conservation in the area apply.

12. I object to the fact that the changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”

13. There is insufficient employment opportunities on the proposed site. All residents will therefore need to travel to work by public or private means.

14. Additional visitors to the RHS Wisley have not been included.

15. Local roads are at capacity and increased public transport would have to negotiate over already overcrowded SRN. They would be unable to offer a reliable service

16. The site is further from the railway station than any other proposed site. This station has insufficient trains to deal with increased passengers and a very small car park which is already filled to capacity. There is no scope to increase the size of the car park.

17. I object to the application of new housing on the old Wisley Airfield on the ground that it is the least sustainable strategic site in either version primarily due to its physical location

18. Its location to the M25 at J10 and the A3 means overloading one of the most congested junctions in SE England.

19. Additional bus services would compromise the safety of those cycling and walking in the area.

20. Reliance on Woking Station is unsustainable. Woking is already at capacity in terms of the station itself and nearby parking.

21. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.

22. I believe that opportunity (3) should be common to all sites and is not unique to this site. I object that insufficient consideration has been given to this.

23. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB. What has been done in this regard?

24. I object to the removal of additional 3.1 ha from the green belt without any justification.

25. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3

26. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

27. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

28. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

29. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
| 30. | I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS. No reasonable explanation has been given for this. |
| 31. | I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification. |
| 32. | 29. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels. |
| 33. | I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development. I particularly object to the reliance on the Carter Jonas study update 2017 which includes “demand” for retail space from companies already in administration. |

I therefore consider that this plan is unsound and not fit for purpose and must be rejected.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/624  **Respondent:** 11014401 / Peter Doyle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans. In the light of the EU referendum result the calculation must also be reassessed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/625  **Respondent:** 11014401 / Peter Doyle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**
I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/937  Respondent: 11014401 / Peter Doyle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

10. Lastly, I object to the continued inclusion of a site where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/938  Respondent: 11014401 / Peter Doyle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
7. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation. No habitats assessment has been carried out.

9. I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1932  Respondent: 11014401 / Peter Doyle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/1930  Respondent: 11014401 / Peter Doyle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7102  Respondent: 11014753 / Ian Peel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In the wider picture I object for similar reasons to those above to your unsustainable plans for Ockham, Wisley, Ripley. There is simply NO EVIDENCE to support the need for housing on this gargantuan scale, and this proposed gargantuan scale of population growth simply cannot be supported by our local roads, schools and other infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15946  Respondent: 11014753 / Ian Peel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

You have completely misunderstood the nature of our local shops at Station Parade. It is nothing like a "District Centre" and should not be targeted as such for future "urban developments".

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15945   Respondent: 11014753 / Ian Peel   Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

You have simply not considered the infrastructure needed to support your preposterous population growth plans. Our local schools, such as the Raleigh and The Howard of Effingham are already bursting at the seams. Our doctor's surgery is overloaded, as is our drainage even now when we get heavy rain. Your proposed growth is not practical, deliverable or sustainable here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15944   Respondent: 11014753 / Ian Peel   Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object vehemently to the Guildford Borough Proposed Submission Local Plan: Strategies and Sites June 2016. Your proposed submission local plan is so offensive that it is hard to know where to begin my objections.

I object to your proposal to remove the Horsleys from the Green Belt. The Green belt has prevented planners and developers from "concreting over" the South East for 5 decades. Your ignorance, arrogance and short-termism in wishing to remove this precious protection is breath-taking. How can you live with yourselves and the prospect of being the destructive group who initiated the despoliation of the beautiful county of Surrey? Vandalism on this scale is not just
justified by current housing needs. I note that you are not prepared to reveal the mathematical models used to support the SHMA underlying this plan. You seem to have singled out West Horsley for 35% population growth - more than anywhere else in the Borough, for no sensible or stated reason. Nor have you shown any other "exceptional circumstances" required to diminish the Green Belt and remove West Horsley from it. You have also extended the boundaries of the Settlement areas of the Horsleys for no apparent good reason.

When these precious green spaces are gone, they are gone forever. Don't have this environmental devastation on your consciences. Your proposals are ill-conceived, unsympathetic to the character of this part of Surrey, and completely unsustainable. Please re-consider them radically and urgently. I vehemently object to them all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/744  Respondent: 11014881 / Linda Peters-Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2 Sites in East and West Horsley (sites A36-41)

I object.

The council leaders representing Ash and Tongham (where the Green Belt is actually being extended) are pushing a disproportionate allocation to this area which will create a mega-village and ruin what is currently two lovely villages.

The number of homes in West Horsley, a rural village will increase by 35% which is also I understand 35% of new homes in the plan with urban Guildford taking only 11%.

The infrastructure and schools, doctors, shops can't take the strain of this together with the c. 2,000 houses planned at Wisley airport.

It would damage local tourism.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1232  Respondent: 11014881 / Linda Peters-Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Sites

1. Green Belt sites

I object.

The policy identifies the principle of development and identifies sites within the Green Belt which is against the will of the people who live there and ignores the 20,000 objections to the previous consultation.

It has no regard for infrastructure and other constraints and doesn't make use of brownfield sites in urban areas that are alternatives.

The Green Belt should be retained in its entirety and short term housing goals shouldn't allow planners to be able to override the long term future of the Green Belt for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1233  Respondent: 11014881 / Linda Peters-Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Three Farms Meadow site (site A35)

I object.

The re-inclusion of this site is very disappointing following the public outcry for its previous inclusion and the rejection of a recent planning application.

It should be removed as it is in the Green Belt, less than 15% is brownfield and the former runway has never had buildings on it. The former runway is a Special Protected Area.

The infrastructure can't cope with the increased traffic and pressure on services it will create.

The cost of improving the infrastructure will mean alternative sites will be more viable if included in the assessment.

It is also disproportional to build 2000 homes in a village of 159. It will also have adverse effects on the Horsleys and put pressure on the Horsley station.

Please reconsider and make the appropriate changes in the plan.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2461  Respondent: 11014881 / Linda Peters-Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy D2 - Sustainable Design, Construction and Energy

I object.

Building in the Green Belt will lead to increased traffic congestion and pollution.

The infrastructure can't cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2462  Respondent: 11014881 / Linda Peters-Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy D3 - Historic Environment

I object.

This should oppose not support development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2463  Respondent: 11014881 / Linda Peters-Smith  Agent:
Policy D4 - Development in Urban Areas and Inset Villages

I object.

Low paid workers won't be able to afford the 'affordable' rent on 'affordable' homes. These should be built in the urban areas. The villages will suffer with the congestion and infrastructure strains and their character changed adversely for ever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Policy E1 - Meeting Employment Needs

I object. The evidence base is not reliable. Industrial and commercial businesses must be concentrated in the urban or existing industrial areas that have infrastructure to support it rather than the rural areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy E2 - Location For New Employment Floorspace

There is no justification to build new B1 office employment floorspace in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2454  Respondent: 11014881 / Linda Peters-Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Policy E3 - Maintaining Employment Capacity and Improving Employment Floorspace

I object. The policy resisting office to residential change of use contradicts government policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2455  Respondent: 11014881 / Linda Peters-Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Policy E4 - Surrey Research Park

I object. By protecting the university for business use and expanding the Research Park it is to the detriment of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2456  Respondent: 11014881 / Linda Peters-Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
Policy E5 - Rural Economy

I object. Villages need protecting. The policy is incompatible with the high number of proposed houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Policy E6 - The Leisure and Visitor Experience

I object. Tourism doesn't depend on new attractions and could be damaged by creating them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Policy E7 - Guildford Town Centre

I object.

There is a need to use brownfield sites for residential development before considering development outside the urban area.

There should be more of a residential allocation in Guildford town centre which is where the young want to live.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2459  Respondent: 11014881 / Linda Peters-Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E8 - District Centre

I object.

The proposal that sites on the edge of district centred should be considered for retail will allow expansion of retail and help pave the way for new housing estates in the countryside.

Rural retail capacity should be left to local demand.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2460  Respondent: 11014881 / Linda Peters-Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E9 - Local Centres

I object for the same reason as Policy E8 above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2444  Respondent: 11014881 / Linda Peters-Smith  Agent:
<table>
<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>Policy H1 - Homes For All</td>
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<tr>
<td>I object.</td>
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<tr>
<td>I support higher density in the urban area.</td>
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<tr>
<td>Much of Guildford town centre could be regenerated to higher rise developments.</td>
</tr>
<tr>
<td>Student accommodation should be provided on campus to free up family accommodation in the urban area.</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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| Comment ID: PSLPP16/2445  Respondent: 11014881 / Linda Peters-Smith  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
| Policy H2 - Affordable Homes |
| I object. Affordability is being used to push more development. |
| Under the national definition they are to be sold or rented at 80% of market value. Even at 70% these will remain beyond most people's means meaning they won't be available for local people. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

| Comment ID: PSLPP16/2446  Respondent: 11014881 / Linda Peters-Smith  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
### Policy H 3 - Rural Exemption Homes

I object. Need to limit rural exception to demonstrable local need that can't be met elsewhere.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPP16/2464</th>
<th>Respondent: 11014881 / Linda Peters-Smith</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

### Policy 11 - Infrastructure and Delivery

I object.

The plan targets greenfield sites which requires heavy infrastructure.

Most of the infrastructure is old and congested and cannot cope with the increased demands that will be placed upon it.

The infrastructure improvements would need to come first and the plan needs to reflect this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<th>Comment ID:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
### Policy 12 - Supporting the Department of Transport's Road Investment Strategy

I object.

The policy is too optimistic and the decisions are a long way off. The schemes are expensive and may not be built.

The draft plan commits to building housing estates in the countryside before these improvements are in place.

The policy will create massive congestion and disruption.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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</table>

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

### Policy 13 - Sustainable Transport For New Developments

I object.

The policy is inspirational, unrealistic and have not been thought through.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<tr>
<th>Comment ID: PSLPP16/2467</th>
<th>Respondent: 11014881 / Linda Peters-Smith</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4</td>
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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

### Policy 14 Green and Blue Infrastructure

I object.

The plan to build on Green Belt and villages will cancel out any benefits of enhancing biodiversity.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

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**Comment ID:** PSLPP16/2447  **Respondent:** 11014881 / Linda Peters-Smith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Policy P1 - Surrey Hills Area of Outstanding Natural Beauty**

I object. The policy should strengthen existing protection not weaken it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

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**Comment ID:** PSLPP16/2448  **Respondent:** 11014881 / Linda Peters-Smith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Policy P2 - Green Belt**

I object and disagree.

We should not allow the relatively short term 15 year plan spoil the legacy of future generations.

Once gone the Green Belt is gone forever.

The general extent of the Green Belt has not been retained which is stated in the policy.

The policy omits any assessment of the value of the Green Belt. The policy severely understates the loss of Green Belt land.

The required housing allocation should be spread across the borough and not burdened in one part on Green Belt land which will put strain on infrastructure and change the character of these settlements.
Developers will want greenfield sites as building costs will be lower. 8086 houses are proposed for Green Belt compared to 1135 for the Guildford urban area which is inequitable, will destroy the Green Belt and disincentives Urban regeneration.

The policy makes all villages in the green belt vulnerable to large blocks of new development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2449  Respondent: 11014881 / Linda Peters-Smith  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P3 - Countryside (Beyond the Green Belt)

I object. There is no need to build on greenfield sites if brownfield sites are used efficiently.

Why not build in Ash and Tongham rather than extend the Green Belt here?

Surely the existing Green Belt and Area of Outstanding Natural Beauty should be more protected than these new areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2450  Respondent: 11014881 / Linda Peters-Smith  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P4 - Flood Risk and Water Source Protection Zones

I Object.

Urban development of existing hard standing wouldn't create additional flood risk if improved flood prevention measures were included when it is being designed.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2451  Respondent: 11014881 / Linda Peters-Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P5 - Thames Basin Health Special Protection Areas

I object. Suitable Alternative Green Space is not beneficial as they are already green spaces and is being used to justify development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2442  Respondent: 11014881 / Linda Peters-Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the draft local plan and have listed my objections below:

Policy S1 - Presumption in favour of sustainable development

I object.

The plan has no regard for the Green Belt.

The plan has a development bias committing to approve applications wherever possible and without delay.

The Green Belt was set up to protect green areas in perpetuity and Policy S1 should commit to uphold its boundaries and protections.

No definition is given of 'sustainable development' - should meet needs of present without compromising the ability of future generations to meet their needs.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/2443</th>
<th>Respondent: 11014881 / Linda Peters-Smith</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S2 - Borough Wide Strategy

I object to the proposal to build 13,860 new homes. If a lower number were proposed it would remove the need to build on the Green Belt.

The plan fails to set a housing target of new homes or explain how this relates to housing need. It exceeds the 13,860 total.

The assumptions and calculations are hidden and are using a model belonging to consultants that are openly pro development.

The projections for economic and population growth should be revised downwards especially in view of Brexit.

The West Surrey Housing Market Area is too small and adjacent districts of Rushmoor and Mole Valley are outside the area.

The area is artificial and the absence of a suitable alternative doesn't make 'West Surrey' reliable. There is a highly lopsided distribution of proposed developments in Surrey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPA16/1654</th>
<th>Respondent: 11015009 / Laura Fletcher</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposed building of 533 new houses in East and West Horsley (an increase of 35%). This amount of housing will completely change the rural character of the villages. The high density proposed would not reflect the existing character of the area and would create suburban housing estates in this rural setting. There is no justification for developing Green Belt land, except in very special circumstances. No ‘special circumstances’ have been put forward by the Council. We need to protect the Green Belt and stop our countryside from being destroyed. This is particularly true of the proposed development at Sites A41, A39, A38 and A40.

It will also place huge pressures on: local schools, doctors surgery, drainage infrastructure, road network, parking at local shops and rail stations. The Council has not considered the infrastructure needed to service this level of development, despite the fact that the National Planning Policy Framework states that new residential development must respect the character and density of housing in the area and be limited in quantity by the availability of infrastructure and local facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/3174</th>
<th>Respondent: 11015009 / Laura Fletcher</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A40</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Plot A40

I particularly object to developing the land, currently part of the curtilage of Waterloo Farm. The site is rural in character and enhances the setting of the historic farmhouse. This would be unacceptable backland development. The site is regularly waterlogged and floods (as does our back garden and the campsite). Houses on this site would further exacerbate drainage problems in this area. The main sewer which crosses the site would also constrain development. The settlement boundary along the rear boundaries of properties on Nightingale Crescent should be retained.

The amount of development proposed for East and West Horsley is out of proportion with the rest of the Borough. It is unbalanced and unfair to propose such a high level of housing in one small village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPA16/3961</th>
<th>Respondent: 11015329 / Nick Riederer</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
In fact the case for building houses in the South of England at all has not been made – the UK birth rate is less than 2 children per family - the perceived demand for housing is artificially fuelled by people living longer and by the high level of immigration into the country. The first of these two points means that you should be building retirement homes not housing estates and the effects form the second issue needs to be re-visited following the country’s decision to leave the European Union and the general position that the UK should strengthen its immigration measures from both the EU and other nations outside the EU.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3962  Respondent: 11015329 / Nick Riederer  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The environmental impact of the vast number of new residents commuting in and out of the area would put a massive additional burden on the existing road networks and transport infrastructure that is already buckling under the weight of lack of investment or maintenance by Guildford County Council – Have you tried driving down ‘Long Reach’, ‘Ripley Lane’, ‘The Street’, ‘East lane’?

New residents on the proposed scale would put an unsustainable strain on the local schools – I remember what a struggle I had getting my son into the local Primary School and there are annual arguments over catchment areas between the local villages just to get children into the geographically nearest Secondary Schools. The proposals do not address these problems adequately they would just make them worse and mean parents would have to drive their children to schools many miles away putting further strain on the inadequately maintained road system and further increase pollution of the local environment.

The increase in housing will also strain the services infrastructure, local sewage and drainage requirements are overloaded as can be seen after a heavy downpour water floods over Ripley Lane and The Street between the Railway Bridge and Long Reach due to many natural springs in the area. Localised flooding will of course be compounded by the proposed new homes the plans take no account of this.

It should also be noted that during the building of these new houses what is left of the local roads will quite literally be destroyed, a year ago heavy construction lorries were employed at Jury Farm for a couple of months in Ripley Lane and the Road was structurally damaged as a consequence and has still not been satisfactorily repaired. Building in the local area on the scale proposed will never be made good by the construction companies lining up to build on nice Green Field Sites. It will be the local Tax payer that picks up the bill and endures the years of misery during and following the extensive construction.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16457  Respondent: 11015329 / Nick Riederer  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I also object to the proposed changes to the village settlement boundaries in particular where there is no proposal to build new houses – what possible reason could there be? It is obviously a hidden agenda to permit further building in these areas at a later date without having to obtain separate approval in the future, if this plan is approved it won’t be long before the whole area will become in a London Suburb or ‘New Town’ by stealth.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I note that in the latest version of the local plan that the Station Parade in East Horsley has been designated a District Centre which is incorrectly identifying the village facilities in order to justify inappropriate development of the area.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I would like to register my objection and discontent regarding the impact of Guildford Borough Council’s current Draft Local Plan and in particular object to its impact on West/East Horsley and its immediate environs and its disregard for the existing designation of Green Belt Protected Areas for which I believe no valid case has been made or exceptional circumstances proven. The proposed level of development disregards the National Planning Policy Framework that requires new residential development to respect the character and density of housing in the area.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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Comment ID: PSLPP16/16458  Respondent: 11015329 / Nick Riederer  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I should also like to state that the extent and number of new houses proposed in the Horsley’s, Ripley, Send and Wisley areas is totally out of proportion to any local requirement, I believe the mathematical model used to develop the Strategic Housing Market Assessment is flawed, there is no industry or business case for increased housing on this scale (a 35% increase in West Horsley). If new housing is required it would be better to site it close to where that need really is.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1824  Respondent: 11015329 / Nick Riederer  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I urge the Council to-

1. Think again on a local scale and consider what is actually needed by the people living in the borough and not some artificially inflated requirement that will only benefit building developers in the short term.
2. Go back to Central Government and seriously question the whole premise of this notional housing requirement. Can we really need over 4000 houses in the local area when it will only compound the pressure on local facilities and have a major negative impact on the local environment, adversely affecting the quality of life of all those currently living in the Guildford environs.

I believe that there is plenty of room for new housing and properties that could be refurbished in other parts of the country, without the impact to sensitive environmental and designated Green Belt or conservation areas where effort should be put to regenerate both jobs and industry supported by investment in affordable housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
7. I object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

   1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
   2. It is further from railway stations than any other identified strategic site.
   3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (M25, J10)
   4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)
   5. The local road infrastructure has had little to no investment in recent years and any increase in traffic will further degrade/destroy the road surfaces and appalling levels of subsidence.
   6. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
   7. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally impractical and unsafe.
   8. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers are likely to increase significantly year on year.
   9. The associated traffic increase from the RHS has not been taken into account.
   10. The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account
   11. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
   12. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.
   13. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
   14. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”
   15. Opportunity (3) should be common to all sites and is not unique to this site
   16. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
   17. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
   18. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
   19. I object to the removal of additional 3.1 ha from the green belt without any justification
20. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.
21. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.
22. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
23. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.
24. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
25. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.
26. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.
27. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.
28. I object to the extension of the plan period by 1 year as it has not been identified as a major change.
29. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
30. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.
31. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
32. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
33. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.
34. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.
35. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.
36. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.
37. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.
38. I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development. I particularly object to the reliance on the Carter Jonas study update 2017 which includes “demand” for retail space from companies already in administration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2081   Respondent: 11015329 / Nick Riederer   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
6. I object to the revised proposal in that flawed evidence continues to be relied upon to justify overexpansion, Guildford town centre needs more apartment homes not more shopping space. Online retailing is driving major change in ways of shopping, reducing the requirements for shop frontage there are numerous reports published on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2080  Respondent: 11015329 / Nick Riederer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5. I object to the fact that Guildford Borough Council is choosing not to constrain its overall housing growth, as many other Councils have done to protect Green Belt. The objectively assessed housing target, though reduced since 2016 to 12,466 homes, will by 2034 (the end of the Plan Period) mean that Guildford has grown by nearly 25%. This is nearly double the Office for National Statistics prediction for the growth of Guildford and therefore quite unnecessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2079  Respondent: 11015329 / Nick Riederer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. I object that nothing has been put forward since last year’s Consultation to improve the sustainability of the West Horsley development sites and thus meet National policy requirements. Every home on the West Horsley sites will need a minimum of one car to enable residents to get to shops, medical centre, library and Horsley Station, regardless of how much pressure is applied to adopt cycling and walking as the preferred means of travel a realistic estimate of 3 cars per home should be considered a minimum given the rural location and age demographics.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2078  Respondent: 11015329 / Nick Riederer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Firstly I object to the fact that no changes have been proposed since the 2016 consultation to the insetting of West Horsley and East Horsley from the green belt despite numerous objections at the time.
2. I object to the very large number of new dwellings proposed on Green Belt. Whilst the reduction in the number of new homes proposed in the Green Belt after the 2016 Consultation, is welcomed (90 in West Horsley, 1100 in Normandy and Flexford) I believe that the case for building on Green Belt land at all is not proven and should be rejected in entirety.
3. I object to the revised proposal that the eastern side of the West Horsley Borough is now scheduled to take an even greater proportion of new homes in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4545  Respondent: 11015425 / David Jenne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

West and East Horsley is also a green belt area and the Surrey Hills an Area of Outstanding Natural Beauty (AONB) and as such must be protected. As a residents of West Horsley I totally oppose the village’s removal from the Green Belt or the change in its status. The Green Belt and Countryside Study is flawed with no sound case whatsoever for justifying changes to the Green Belt boundaries laid down many years ago by national legislation. The evidence document ‘Guildford Borough Economic Strategy 2013-2014’ makes no case for siting large numbers of additional homes in West and East Horsley or neighbouring villages.

In summary I am totally opposed to the proposal of hundreds of homes on Green Belt areas in West and East Horsley and indeed the villages around including Ockham and Wisley which is a planned population growth well in excess of the Government 2014 forecasts. This would be totally out of character with the existing mix of different housing styles and layout in the village and would be unsustainable in terms of infrastructure, such as drainage, road capacity, schools, shops, parking and public transport and the supposed need for so many houses over the Plan period is not proven. Indeed, West Horsley’s own Parish Council through a 2014 Housing Survey is able to confirm a limited need for up to 20 affordable homes for local people who want to remain in the village, i.e. for young people and for elderly people wishing to downsize to smaller homes.

The additional plan to build over 2000 homes in Ockham on the former Wisley Airfield, less than 2 miles away puts an utterly unsustainable strain on the infrastructure of West and East Horsley and all the surrounding small villages, not to mention a detrimental effect on the day-to-day village life for current residents. The Plan also infringes my understanding of Government policy to protect the Green Belt and I attach a letter from Brandon Lewis MP dated, 17th February 2014 regarding Ministerial Guidance on the Green Belt. Finally, these plans are being considered before other Brownfield sites are prioritised, which are stated to be more sustainable in order to avoid the irreparable damage to the Green Belt.
The Plan is ill judged, unnecessary and unproved and will damage a Green Belt area of outstanding natural beauty and affect the lives of current residents who are already having to tolerate poor roads, lack of state school provision, congestion and poor local and council services, and poor infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/60  Respondent: 11015425 / David Jenne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley South

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In the policy statement our village is wrongly classified as two villages, West Horsley South and West Horsley North. West Horsley’s Defined Settlement Area boundaries DO NOT need to be extended and no exceptional circumstances or justification for insetting these areas from the Green Belt have been presented. Expansion of both West and East Horsley is unsustainable with limited bus services on week days only through West Horsley it clearly means an unmanageable amount of additional cars on the road. The roads within the village are so bad that I consider them to be the worst I have driven on in the United Kingdom and are in need or urgent repair. My own and my daughter cars have been damaged by dangerous potholes and the roads will simply not be able to cope with the increased traffic that will come with the building of so many houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/172  Respondent: 11015425 / David Jenne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to strongly object to the proposed building of hundreds of houses in multiple estates around the villages of West and East Horsley. The proposed developments will put enormous strain on the infrastructure and the day-to-day life of the village.

The village does not have enough state school places locally for children at primary and secondary schools, with The Raleigh School in West Horsley and The Howard of Effingham School in Effingham are already well over-subscribed meaning many local children have to travel many miles to other schools outside the local area. I live in the same road as the Raleigh School and during the morning and afternoon school run it is almost impossible to gain access in, or out of Northcote Crescent because of dangerously cars park along the length of Northcote Road and Northcote Crescent. It is also
incredibly dangerous for pedestrians at those times, most of whom are small children. In addition private schools, Cranmore and Glenesk are well supported by children from West and East Horsley but also by families who travel to them every day from many miles away bringing in even more traffic to the village and the main A246 road.

The villages have small parades of shops in both West and East Horsley which are already too busy at most times during the week for parking and more houses are obviously going to make an already difficult situation impossible. West Horsley has no Post Office or Bank so residents have to go into East Horsley. Horsley station which is a main commuter line to London Waterloo is already severely busy 7 days a week with inadequate parking availability, particularly on Monday to Friday. With more residents it is impossible to see how additional parking facilities will be made available in the villages or at the station as there is no space to do so, which in turn will likely mean increased parking charges, which are already inexcusably high at the station.

The local Medical Centre in Kingston Avenue serves West and East Horsley and many villages further beyond the boundaries is already extremely busy. I regularly encounter difficulties getting appointments which is no doubt shared by other village residents and more houses are going to make this service unable to cope. The planned additional houses will also no doubt put strain on the Royal Surrey Hospital.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/604  Respondent: 11015489 / Lorraine Pipe  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/910  Respondent: 11015489 / Lorraine Pipe  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPI) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1851  Respondent: 11015489 / Lorraine Pipe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1852  Respondent: 11015489 / Lorraine Pipe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

As a local resident in Ockham, I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1853  Respondent: 11015489 / Lorraine Pipe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1850  Respondent: 11015489 / Lorraine Pipe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3185  Respondent: 11015585 / Vivian Channing  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to submit my objection to the proposed Local Plan for West Horsley as yet again the wishes of the residents appear to be ignored again with the extension of the settlement area boundaries.

The green belt is precious and the Horsleys should NOT be removed from this protection against inappropriate development. There are no exceptional circumstances or justification with the proposed insetting of the two parts of the village. The boundaries of West Horsley do NOT need to be extended.

The roads, drainage, schools, parking and medical facilities are already under pressure and any additional large development would put further pressure on these facilities.

In particular the enormous proposed development at Wisley airfield would totally change the villages and put roads, schools etc under impossible strain.

The green belt is precious and should be protected.

There is plenty of brown field development potential to use first without destroying the green belt and the villages

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5264  Respondent: 11015617 / J Fiona Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to building 45 houses at Clockbarn Nursery. Tannery Lane is a narrow, winding road. The junction with Send Road is already hazardous for vehicles emerging to join the main road. There will already be an increase in traffic on Tannery Lane, as planning permission has previously been granted for 64 apartments to be built at the Tannery and for a Marina to be built. This little lane will not support more traffic! It would result in the junction with the main road becoming absolutely treacherous.

I request that my comments above are shown to the Planning Inspector who is responsible for deciding on the implementation of the Local Plan in respect of Send Village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5262  Respondent: 11015617 / J Fiona Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to building 400 houses and 700 square metres of industrial space at Garlick’s Arch. This land, opposite Send Marsh Road has the distinguished heritage of being ancient woodland. It is inappropriate to consider building on such land, not only because of its provenance, but also because it tends to flood. Industrial buildings, even if they are genuinely required, would be better sited at the existing Slyfield industrial estate. Guildford’s housing needs have been markedly over-estimated: no calculations as to how the supposed number of new houses required have been made available for scrutiny. This serves to further undermine Guildford Council’s position.

If new houses really did need to be built, a far more sensible approach would be to utilise brownfield sites. Once green fields and woodland have been submerged in concrete they are lost and gone forever. Not just for our generation. Not just for the time being. For generations to come. What an appalling legacy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5263  Respondent: 11015617 / J Fiona Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to a new interchange with the A3 at Burnt Common. Why? Because Send Road is already very busy, with high noise and pollution levels. Much of the traffic travelling between the A3, M25, Woking and Guildford generated by the proposed 1850 new houses at Blackwell Farm, 2000 houses at Gosden Hill, Burpham and 2000 at Wisley Airfield would go through Send. This would overload an already busy, noisy and polluted road, resulting in Send becoming gridlocked. This cannot be permitted to happen.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Local Plan Consultation

I am writing to OBJECT to the local plan in respect of Send Village. In particular:

I OBJECT to Send Village being removed from the Green Belt. The purpose of Send’s Green Belt is to prevent Woking and Guildford become one sprawling conurbation, to provide ‘breathing space’ between these two very different towns. This Green Belt was intended to be permanent, as stipulated in the National Planning Policy Framework. There are no special circumstances that permit any deviation from the original intention. In addition, local councillors and central government gave a clear election promise to protect the Green Belt. Any honourable individual worthy of public office would not break such a promise, particularly when viable alternative solutions exist.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I continue to object to the 2017 New Local Plan. Whilst the plan is extensive and covers the whole borough, I will confine my comments to those specifically relating to Gosden Hill Farm (Policy A25).

My objections are:

1. The proposed new junction off the A3 is inadequate and will have a devastating effect on traffic flows in the area:

During peak periods traffic already tails back on to the A3 even with a lengthy slip road up to the first roundabout at the junction with Great Oaks Park. The plans do not appear to allow for even a similar length slip road, let alone sufficient for the extra volumes of traffic which must be associated with the Gosden Hill development and other developments proposed in the area such as the Slyfield Area Regeneration Project (SARP). There will therefore be increased traffic queues tailing back onto the A3 which will lead to additional levels of congestion, accidents and injury on this major trunk road. The positioning of the junction nearer to the bend in the A3 will also reduce the sightlines ahead of the junction further increasing the road hazard.

1. All of the northbound traffic coming from the new development at Gosden Hill will be forced to drive into Burpham before taking the existing junction northbound. Southbound traffic for SARP will also take this new junction with consequent traffic gridlock right through the centre of Burpham.

2. Any new road infrastructure must come before the development starts. With Highways England considering its wider plans for the A3 through Guildford over the next three years it seems short sighted to include a new exit off the A3 which may have to be substantially reconfigured when Highways England's plans become clearer. Indeed, plans to install a new junction with the B2215 and A247 or a new tunnel might be prejudiced by the new Gosden Hill junction. Any development should therefore be subject to Highways England's strategic development plan.

3. The plans for a park and ride facility as part of the Gosden Hill Facility appear to have been watered down to that required by 'projected demand'. Projected by who? Demand will be created by good supply and will reduce the numbers automatically using their cars. The policy also has an apparent conflict as there is no land allocated to park and ride (deleted in first section) yet there is a requirement in the next section to provide Park and Ride, albeit in the vague terms described above.

4. We are already seeing an increase in static vehicles on the London Road with the attendant nitrogen dioxide and particulates pollution. Studies have shown the dangers to public health associated with these harmful pollutants so it is hard to understand why planning policy should include proposals which will increase their levels. Reference is made to the developer contributing to the Sustainable Movement Corridor along the A3 100 yet the plans to improve movements along the route are unclear. There is no space to widen the road to accommodate an extra lane for buses, taxis or cyclists so what is being proposed? It seems that the Eastern section of the Corridor is more aspirational than a plan (GBC update June 2016) and needs to be worked up properly for public consultation before the Local Plan is submitted for approval. The implementation timescale in Appendix C should also precede any development at Gosden Hill.

The opportunities listed include the potential to provide a through route within the site to divert the B2234 to form a more direct link to the A3. This would appear to conflict with the protection of green spaces designated by the Burpham Neighbourhood Plan and should therefore be deleted rather than usurp the authority vested in the Neighbourhood Forum.

I note that secondary educational need will now only be assessed when the planning application is 'determined', rather than when it is 'made'. I may be being pedantic, but it does seem that the need for secondary education should be established as part of the application itself. Otherwise a planning application could provide for no educational facility and be approved at which point the Council starts to think about educational provision, only to find there is no land left locally on which to build new facilities.

Hence, I believe that the wording should be changed back to 'made'. As requested by the latest consultation, I have restricted my comments above to the highlighted changes in the updated Local Plan. In no way should they be taken to mean that I agree with the appropriation of Green Belt land for development. I am implacably opposed to the development of the Green Belt and am far from convinced about the need for additional housing at the levels discussed in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the inclusion of this site because it is NEW and was not included in the regulation 18 draft and has NOT been consulted upon previously.

I object because its development for housing is inappropriate owing to its permanent Green Belt status. The Green Belt was originally proposed in 1935 to ensure space between villages and not turn into an urban sprawl. No one has the right to take this away from us – once its gone its gone for ever which will have a huge impact for our future generations.

I object on Health and Safety grounds since the subsoil of the existing landfill site contains documented unsafe landfill waste which is currently vented and monitored. Any disturbance of this waste for housing development gives rise to environmental risks (methane gas, asbestos etc). When purchasing our home in 2010 our Environmental Survey reported issues with regards to the landfill site – we experienced lengthy delays whilst consulting with Guildford Borough Council over this matter.

I object to the siting of the development because the narrow width single track country road (with no pavement) provides insufficient access, particularly with the expected increase in traffic. The road already gets blocked due to the school at the end of the road twice a day.

I object to the adverse impact on the tranquillity of the recently enlarged cemetery.

I object to the loss of wildlife habitat as the site is home to many species of bird, reptile and insect.

I object to the adverse impact on the character of the village as a desirable, pleasant place to live. The proposal to build over 400 houses will have a huge impact on the local schools, doctors and transport.

I wish my objections to be brought to the attention of the Government’s Planning Inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
OBJECTIONS TO THE LOCAL PLAN

With reference Policy A44 (Land west of Winds Ridge and Send Hill) in the Guildford Borough Proposed Submission Local Plan: strategy and sites June 2016

I object to the inclusion of this site because it is NEW and was not included in the regulation 18 draft and has NOT been consulted upon previously.

I object because its development for housing is inappropriate owing to its permanent Green Belt status. The Green Belt was originally proposed in 1935 to ensure space between villages and not turn into an urban sprawl. No one has the right to take this away from us - once its gone its gone for ever which will have a huge impact for our future generations.

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I wish my objections to be brought to the attention of the Government’s Planning Inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/222  Respondent: 11016001 / Brenda Tulloch  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I object to the use of Green Belt land - once its gone its gone forever which will have a huge impact for our future generations.

Also Green Belt is continually used for walking - wildlife - children to play on etc

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: SQLP16/223  Respondent: 11016001 / Brenda Tulloch  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I Object because the proposed Send developments were never mentioned in the original local plan. This addition requires another full consultation under regulation 18.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/225  Respondent: 11016001 / Brenda Tulloch  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I object on the grounds that local infrastructure cannot cope with the additional houses. Do we have enough school places - Medical resources and capacity on the roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/228  Respondent: 11016001 / Brenda Tulloch  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object on the grounds that I find this questionnaire impossible to understand for the average person. How are we supposed to make rational comments when it is not written in plain everyday language.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/231  Respondent: 11016001 / Brenda Tulloch  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I object to the use of Green Belt land - this was proposed in 1935 and should not be taken away for future generations.

Despite repeated election promises to protect the Green Belt. Any new housing should be built on brown fill sites so that local facilities can cope with smaller increases. Regarding Policy A44 - Send Hill is a very narrow road with no pavements - any increase in traffic would make this very unsafe for the children attending the school at the end of the road. Also on Policy A44 - the land west of Winds Ridge and Send Hill is unsafe to build on due to landfill waste giving rise to environmental risks (methane gas, asbestos etc)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/837  Respondent: 11016001 / Brenda Tulloch  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy A58 – Land at Burnt Common

I object to the above policy because there is no need to build industrial developments in the middle of Green Belt when there are plenty of empty sites at Slyfield and other Guildford locations.

The extra traffic will cause gridlock to an already busy road system.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the SHMA figure set at 693 houses in the borough per annum (appendix D). This figure is unacceptably high. With almost 14,000 houses planned over a 15-yr period from 2016-2031, the number of houses is flawed. Furthermore, the model used to determine this need has so far not been shared and has been declared flawed by various sources. The population growth is not sustainable and cannot be allowed to go ahead. In Horsley, this equates to a 35% increase in housing, which is higher than in any other proposed area, and on greenbelt, disregarding planning policy advice which clearly states that greenbelt should be a constraint to development. For the reasons above, Horsley cannot sustain this level of development and the number of houses proposed MUST be revised.

Finally, the local plan is proposing 9,000 new houses on greenbelt. The NPPF requests that any change in greenbelt boundaries must demonstrate exceptional circumstances. It is not enough in the eyes of the law to state housing need as an exceptional need. As no exceptional circumstances have been stated, greenbelt boundaries should not be changed in defining the local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the SHMA figure set at 693 houses in the borough per annum (appendix D). This figure is unacceptably high. With almost 14,000 houses planned over a 15-yr period from 2016-2031, the number of houses is flawed. Furthermore, the model used to determine this need has so far not been shared and has been declared flawed by various sources. The population growth is not sustainable and cannot be allowed to go ahead. In Horsley, this equates to a 35% increase in housing, which is higher than in any other proposed area, and on greenbelt, disregarding planning policy advice which clearly states that greenbelt should be a constraint to development. For the reasons above, Horsley cannot sustain this level of development and the number of houses proposed MUST be revised.
Our villages are already at capacity and cannot support any further pressure on local roads and additional congestion from proposed development. There simply is not the infrastructure in place to accommodate the local plan as it stands and as a local resident I object to the congestion that development will cause our village (policy I 1).

In the Horsleys the roads are narrow, were not intended for modern-day wider vehicles and at capacity. Pavements are lacking and in some places roads have already become extremely dangerous. Increased numbers of cyclists and through-traffic increase the danger and additional traffic numbers would make the situation critical. The roads are littered with potholes and in a constant state of repair. Key roads currently in use which eliminate pressure of Ockham Rd will either be made one way or blocked completely, making traffic congestion on main roads untenable. 5,000+ new houses in the 5 miles between the M25 and Burpham and the increased traffic would only incur additional congestion in the Horsleys and to other areas with planned development. In addition, major roads in the area such as the M25 and A3 would have to be rerouted to accommodate major proposed development such as Wisley airfield. This in turn would impact upon pollution levels around this area, which are already above accepted EU levels.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/8744</th>
<th>Respondent: 11023009 / Julie Atkinson</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>

I object to the policy to remove the Horsleys from the greenbelt. The greenbelt is extremely precious and an essential part of our environment. We have a duty to protect the greenbelt and it is unthinkable to remove our village as proposed. It is part of the character of our village and it protects cities from unrestricted urban sprawl. One of the legal purposes for green belt is to check the unrestricted sprawl of large built up areas – without green belt Horsleys would very soon merge into Clandon and ultimately Guildford. 70% of planned development is on greenbelt and ALL of the development in Horsley on greenbelt.

This policy is flawed and should have been amended. The last consultation revealed 1,322 people against this policy. The only people for green belt development are land developers and local councillors – those set to gain from the development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPP16/8743</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
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I object to the local plan as the proposed development is not sustainable (Policy S1). The proposed number of houses will damage our villages, East and West Horsley in particular, and other local communities including Ockham, Ripley, Send and Clandon. The proposed development of Wisley Airfield is particularly flawed and without the necessary infrastructure in place will put unnecessary pressure on already busy roads and infrastructures in the Horsleys. A greater proportion of the proposed development – in line with need and not inflated – should be in urban areas where there is adequate and sustainable transport. The distance from Wisley to Horsley rail station would mean additional and untenable pressure on already congested roads. The 35% increase in housing planned in West Horsley is a prime example of unsustainable housing. The number and density of the proposed development far outweighs current housing and also levels proposed in other parts of the borough. Importantly, it is against policies within the National Planning Policy Framework. The number of houses MUST be balanced and revised in order to be sustainable in our villages. At present all of the development is on the green belt which is not a balanced and sustainable plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Need for Expansion - Is it really necessary? Appendix D

The arguments that have been put forward are not convincing - who is right? It seems that such expansion is based on evidence that must be questioned again.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/5770</th>
<th>Respondent:</th>
<th>11023105 / Ian &amp; Rosemary Spence</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E7</td>
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But do we really need so many additional shops when internet shopping is predicted to grow and grow.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPP16/16635</th>
<th>Respondent:</th>
<th>11023105 / Ian &amp; Rosemary Spence</th>
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<th>Comment ID:</th>
<th>PSLPP16/5766</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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</table>
### Infrastructure Policy

It seems totally wrong to embark on what is proposed before the existing transport problems have been resolved. The Council should sort what we have now before being faced with even more problems due to the implementation of further development. And where should such developments be:

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16633</th>
<th>Respondent: 11023105 / Ian &amp; Rosemary Spence</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Development

Assuming that there is a need for some expansion, use Brownfield sites rather than on the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/5771  **Respondent:** 11023105 / Ian & Rosemary Spence  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am fearful of what is proposed will do to Guildford. The Local Plan as proposed should be rejected. Growth is required but NOT to this extent, and NOT before the need for expansion has been challenged.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/16634  **Respondent:** 11023105 / Ian & Rosemary Spence  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Assuming that there is a need for some expansion, use Brownfield sites rather than on the Green Belt.

I am fearful of what is proposed will do to Guildford. The Local Plan as proposed should be rejected. Growth is required but NOT to this extent, and NOT before the need for expansion has been challenged.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/3555  **Respondent:** 11023201 / Steve Johnson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Wood Street Village
My name is [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]. I wish to strongly oppose the revised Local Plan because rather than addressing the many issues we have, it exacerbates them.

First and foremost the base infrastructure we have now is totally inappropriate, that's before we have potentially an additional 1200 houses (2400 cars?) built local to the village. Every day between 7.45 am and 9 am there is a stationary queue of traffic out the front of our house, heading towards Guildford, it is practically impossible to get out of the drive. We are nearly 200 metres from Rydes Hill roundabout. The queue goes right back beyond Oak Hill. Each additional car/lorry is a problem...2400 would be a disaster.

Each year we have to have tankers parked alongside Broad Street Common draining out/relieving the sewage system which cannot cope whenever we have a prolonged spell of rainfall, we have had raw sewage on our back garden in the past......another 1200 houses to be fed into that system??

I also believe it is totally wrong that we are not shown the methodology for determining the number of houses required to be built each year, it is too important a decision to just have to accept as "an act of faith". We must be shown, in an informed way, how this number is arrived at.

Finally, I totally agree for the need to additional housing, particularly for the younger generations who cannot afford to live in their home town...outrageous. However, at the same time we do not need a huge increase in retail/commercial outlets. The planning objective in the town should be to give all those brownfield opportunities to dwellings for people to live in. To assist in providing additional homes the University of Surrey should be made to fulfil its commitment to develop campus accommodation, releasing current town centre and suburban properties, used for students, for local purchase.

I am very happy for someone to come and view the traffic situation (chronic queuing) along Broad Street from our house during normal term time...as many days as you need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Removal of sites A46 & A47 & 10,000 additional homes within 10 mile radius of Normandy

a. General Points:
1. It is my understanding GBC Planning should be directed primarily towards the community it serves. Therefore any planning proposal should be initially filtered against whether or not there is benefit to the affected community & residents.
2. Dissolving or removing Green Belt status from any such area where previously it was believed to be justified – is not a benefit, and should be resisted. Moving “goalposts” around is unfair play.
3. Current Proposals are contrary to the GBC proud boast of “SURREY HILL’S OUTSTANDING BEAUTY”

CONGESTION

Congestion is already dreadful on this section of the A323 during peak hours, and these developments will undoubtedly result in gridlock, as (1,100 + 50 as part of 10,000) homes with the demographic of mainly young working couples with 2 children with each household having mostly 2 vehicles with adults needing cars for school run and work commute. This will give rise to approximately 21,000 additional cars (twice a day) somehow trying to thread their way into the Guildford/Aldershot directions of the A323. Resultant queues will become legendary, and stationary car fumes/pollution will affect the whole neighbourhood adversely.

“Policy G5 (8) Traffic, Parking and Design: The visual impact of traffic and associated access and parking is minimised, especially in sensitive locations”

c. NOISE

The noise of so many stationary vehicles with engines running (and often car audio systems blaring) will also impact each of the homes on the Guildford Road. Even without this development, I am unable to sit in my front garden, or to open any of the windows facing south towards the road.

d. GREEN BELT

Such developments represent a clear violation of the Green Belt Policy which is/was in operation in this area to protect our neighbourhood and to preserve its rural aspect.

“Brown Field” sites should be targeted instead.

e. SAFETY

Increased danger to children, as there will be several hundred more, all requiring access of one sort or another to the already busy A323 Guildford Road. There are currently no traffic lights or safe island crossings on my part of the Guildford Road, and so the incidence of fatalities will increase. Even if these were to be put in place, then the additional congestion would be UNTHINKABLE – making the whole scheme UNWORKABLE!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2768  Respondent: 11023233 / Alex Campbell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Congestion is already dreadful on this section of the A323 during peak hours, and these developments will undoubtedly result in gridlock, as 1,100+50 as part of 10,000) homes with the demographic of mainly young working couples with 2 children with each household having mostly 2 vehicles with adults needing cars for school run and work commute. This will give rise to approximately 21,000 additional cars (twice a day) somehow trying to thread their way) into the Guildford/ Aldershot directions of the A323. Resultant queues will become legendary, and stationary car fumes/pollution will affect the whole neighbourhood adversely.

“Policy G5 (8) Traffic, Parking and Design: The visual impact of traffic and associated access and parking is minimised, especially in sensitive locations”

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Increased danger to children, as there will be several hundred more, all requiring access of one sort or another to the already busy A323 Guildford Road. There are currently no traffic lights or safe island crossings on my part of the Guildford Road, and so the incidence of fatalities will increase. Even if these were to be put in place, then the additional congestion would be UNTHINKABLE – making the whole scheme UNWORKABLE!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. There is inadequate schooling already and these additional dwellings would put further pressure on those in existence.

1. Medical facilities - hospitals, surgeries - cannot cope already so they will not cope with these additional residents and workers.

1. There are no pavements throughout the village of Ockham and much of the surrounding villages (e.g. Ripley, East Horsley) to accommodate safely these extra people proposed on the plan.

1. Railway station facilities for parking at Effingham Junction and East Horsley cannot cope with current demands so they will not cope with these additional numbers of cars.

1. The plan destroys the tranquil environment that we residents have had to pay very dearly to be able to enjoy so the plan is unacceptable on noise pollution levels too.

1. Our democratic right to express our feelings against this plan was put to the test and carried forward at a Council meeting, only to be overturned by Guildford Council - that is NOT democracy!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2400  Respondent: 11023329 / Carol Cordrey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We have lived in Ockham for 35 years, adjacent to the farming land that was known as the Wisley Airfield and which now forms Policy A35 - Three Farm Meadows. We object, once again, to the inclusion of this land in the draft Local Plan on the basis of the following points:-

- Its proximity to already congested roads - A3 and M25 Junction 10 - and the current huge traffic flowing on nearby roads

- Your suggestions of public transport in the area will meet with this existing congestion and even add to it!

- Wisley RHS Gardens already attract massive visitor numbers using cars and coaches and its current extension programme is destined to attract many thousands more. This will intensify congestion

- New residents to Three Farm Meadows will have to add to road congestion to access essential employment as little is available in the local area or in the proposed development

- Your proposal to include Upton Farm in the site will negatively effect its beautiful, historic location. The same applies to the extension of the area you propose as it will negatively impact the Surrey Hills AONB

- The boundaries on the plan are incorrectly identified

- Your plan should not simply LIMIT development in FLOOD ZONES 2 & 3. You should EXCLUDE development there
• You have ignored thousands of democratic objections to the Plan and wasted tax-payers/residents’ money

• Major adjustments have been made to the Plan so that it does not conform to a Regulation 19 Consultation

• The vast housing number you agree to and we object to drives a proverbial steamroller across key restraints of green-belt, air quality, AONB and other key policies that we residents abide by

• The area around the Plan is already affected adversely by inadequate schooling, train station car parking and medical centre facilities. You plan would dramatically worsen these.

• Policy S2 refers to the Housing Target table amounting to 12,426 but your calculations are wrong as the actual sum is 9,810!

• Finally, your Plan will ruin the existing ambience and quality of life that residents have paid dearly to enjoy and uphold against the odds of your political ambitions. You will ruin many lives, compensate nobody and overturn our democratic rights, all of which you should be ashamed of if not sacked for!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2653  Respondent: 11023361 / Peter Davey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.

• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
• I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.
• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
• I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
• I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.
• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPI) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.
• I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.
• Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will mean either major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.
• Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It would destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **I object to Send Village being removed from the Green Belt;** this reneges on the promise from local councillors and central government to protect the Green Belt once it is gone developers will have carte blanche to build whatever and wherever they please.

1. **I object to building 45 houses at Clockbarn Nursery;** Tannery Lane is far too narrow to be able to support any further increase in traffic. Planning permission has already been granted for the old factory to be turned into flats and the marina development has also recently been approved. I regularly walk my dog down Tannery Lane and the road is a death trap at certain times of day it is too dangerous for pedestrian access. It is only a matter of time before someone is killed or seriously injured on this road; the increased traffic generated by building 45 extra houses will only exacerbate this.

1. **I object to building 400 houses and 7000 sq metres of industrial space at Garlick’s Arch;** following discussions relating from the previously submitted local plan, Send Parish Council outlined proposals for houses and industrial units to be built on the strip of land alongside the old A3, a perfect solution to both the housing and employment needs in Send, why has the council now totally disregarded this proposal. The increase in traffic will only increase noise and air pollution. I live in the centre of Send and work at Wisley Garden, I have already had to change my working hours to starting at 07:30 as my 4 mile commute was previously taking over 25 minutes because the existing traffic congestion especially at peak times is so bad. Though sadly it seems that traffic congestion even during the middle of the day in Send is ever increasing.

1. **I object to the development of 40 houses and 2 travellers’ pitches at Send Hill;** to build on this area of green belt is totally unsuitable due to the location. Send Hill is a narrow road and the increase in traffic will only make it more dangerous, with the access at Potters Lane it is single track only. The proposed site is an old land fill site which makes it unsuitable to build on. The site is also well away from the centre of the village and there are no public transport links to the shops or the medical centre. To put traveller’s sites in Send Hill would not be integrating them into the village life but further increase their sense of isolation. The site is also a haven for wildlife, being populated by deer, bats, badgers, foxes etc.

1. **I object to a new interchange with the A3 at Burnt Common;** this seems a total and unnecessary waste of time and money and will only facilitate further traffic to pass through the village. We do not need it.

Thank you for taking the time to read my objections, in principle I am not opposed to new housing projects being built in Send, but these should be on current brownfield sites and on infill areas. The Parish Council should be responsible for
granting permission to agree these smaller developments that will be more in keeping with the overall growth of the village and its facilities at a manageable level.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4342  Respondent: 11023489 / Trevor Pound  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO the lack of immediate provision of local schools.

There is no question that the South East is overcrowded. Whilst I appreciate that this is somewhat inevitable, and refrain from pressing the blame on any one group, it is a fact. It is also a fact that, however honourable this strategy to increase housing at such a rapid rate, local schools will simply not be able to cope.

In following this strategy, you risk condemning a whole generation of local to children to inadequate education. I understand that the Local Council enjoys a Conservative majority in this Borough. As a member of the Conservative Party, I feel absolutely ashamed that you would turn your back on a central principle of the party: equal opportunity. The lack of schooling in the area will cripple the chances of the younger generation of locals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1939  Respondent: 11023489 / Trevor Pound  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I find myself compelled to write again to voice my opposition to the latest version of the local plan.

The specific concerns I highlight as a local resident are about the Send/Send Marsh area but nor do I support the scale of building identified elsewhere in the Local Plan as I don't accept that the only response to perceived pressure on housing is to simply keep building more homes (eg penalties could be imposed where properties are left empty for substantial periods). Accordingly, I think local governments should be pushing back to central government to the extent that quotas are imposed on local governments.
In particular, I fundamentally oppose the sacrifice of green belt land on principle. The green belt was set up by an earlier generation of politicians who understood that, without specific action, the ongoing growth of London would result in one massive suburban sprawl that would eventually destroy the character of the already overcrowded South East. As such, they clearly demonstrated a better strategic perspective than today's politicians who appear to be governed by expediency and short-termism. To sacrifice green belt because of pressure on housing is akin to taking down sea defences in case they get damaged by waves! My specific objections are as follows:

With respect to Send, Ripley & Clandon, I oppose to taking the villages out of the green belt and believe that to do so would just open the way to both Guildford and Woking becoming one unified suburban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1940  Respondent: 11023489 / Trevor Pound  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the sheer scale of development proposed as it is obvious that the current infrastructure would not be able to I regularly use the A3 and A247 and these roads already get jammed at peak times or when there is a traffic hold up.

To permit the scale of building proposed will fundamentally alter the nature of the

Village facilities will be stretched beyond breaking point including schools and medical

The plans are clearly against the wishes of the majority of the residents.

Elected to represent the views of local people, who are clearly against the scale of the proposed building plans, the council should be pushing back against the diktats of central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3850  Respondent: 11023489 / Trevor Pound  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposed development of Garlick's Arch (both residential and industrial) and Gosden Hill because it breaches green belt and would be an example of ribbon development with building creeping down the A3.

I object to the way that Garlick's Arch was incorporated into the local plan at the last minute without proper consultation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO the inevitable congestion on local roads as a result of this housing strategy.

Anybody who lives around Guildford would vouch for the fact that the A3 comes to a standstill several times a week, particularly around the Guildford area. To put it simply, this proposed housing strategy will cause absolutely chaos on the roads, and it is not only an ill-advised strategy as a result, but to ignore this fact would show the Local Council to be extremely naive to the problems we face in the South East.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My objections to the Draft Local Plan are as follows:

1) I OBJECT TO all erosion of the Green Belt.

A brief read of the Green Belt section on the government website highlights several crucial points and indicators for local authorities which have been established over many years, to safeguard rural areas from urban sprawl. I draw your attention to several areas in said literature:

- the government stance outlines that Green Belt's should only be encroached upon in "very special circumstances"
-such special circumstance "will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations"

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17727  Respondent: 11023489 / Trevor Pound  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

-exceptions include "LIMITED infilling in villages..."

Whilst these are only a few of the points I could have selected from the government's website, they act to completely invalidate the thinking behind the 2016 Draft Local Plan. It is not only completely laughable that "exceptional circumstances" should be claimed with regards to this area, but more importantly, even if such circumstances did exist, the government website clearly states that such circumstances allow for LIMITED infilling of villages. The housing proposed in the local area is by no means "limited" and will cause complete overcrowding of the area and a wholly inadequate provision of local services.

In proposing this plan, the local authority has shown a complete lack of understanding not only of the purpose of the Green Belt, but of the terms on which it was created.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8176  Respondent: 11023489 / Trevor Pound  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object that so much of the planned development is targeted on villages and semi rural areas in preference to brownfield sites that have clearly not been researched or prioritized appropriately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: SQLP16/2032  Respondent: 11023489 / Trevor Pound  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO the last minute inclusion of new sites with less than two weeks notice.

The UK today is considered to be one of the world's leading democracies, and is, relatively speaking, a country of transparency and good faith. It is not good faith, however, to include elements of this local plan in this manner. I would kindly request that you familiarize yourselves with the British Constitution, and with the idea that democratically elected officials are elected on the basis of manifestos. Their election by the people is a mandate to carry out the policies within their manifesto, NOT to abuse this trust and attempt to sneak through policy "through the back door".

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/2031  Respondent: 11023489 / Trevor Pound  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In writing this email I intend to outline my objections to the 2016 Draft Local Plan. Before raising my specific objections, I wish to express my disappointment at the Local Council's stance with regards to this matter.

The role of Local Councils is to serve and represent the local area, in the interests of its inhabitants. With a greater understanding of the local area than Central Government, a Local Council is in a unique position to protect those inhabitants from policies which are not only against the interests of those inhabitants, but are also inadequately thought through, where local context may be overlooked, perhaps not in bad faith, but overlooked nonetheless, by centralized bureaucracy. Regrettably, the 2016 Draft Local Plan appears to fall in this bracket.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2605  Respondent: 11023489 / Trevor Pound  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Clockburn Nursery (Policy A42):

The scale of the proposed development is excessive even at the previously agreed level of 45. The proposed increase to 60 would make this development even more out of keeping with the village character.

This development will create additional congestion in Send and the A247/Tannery Lane exit is not suitable for additional traffic volumes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2604  Respondent: 11023489 / Trevor Pound  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Garlick’s Arch (Policy A43):

This potential ribbon development along the A3 will, as above, clog up already busy local roads, which are already struggling to cope with ever increasing traffic volumes.

There is widespread opposition to the excessive scale of the development proposed, which will blur the distinct village characters of Ripley and Send by making the whole area just one large dormitory.

I object to the provision of traveller plots, [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature].

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2603  Respondent: 11023489 / Trevor Pound  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Land at Burnt Common, London Road (policy A58):

This potential ribbon development along the A3 will clog up already busy local roads and I thought had previously been rejected as a site for development. I am unsure why it is now being reconsidered.

I can only assume reference to “minimum” development is an error? Surely any planning proposal should cap development by quoting a maximum!

I am unconvinced that we need additional commercial space over and above that which would be available through the the better utilisation and managing of existing brown field sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

On principle, I reject the building on any greenbelt land. The laudable purpose of establishing the green belt was to stop the relentless sprawl of urbanisation and ribbon development and provide some secure green spaces for the enjoyment of both local residents and city dwellers. To concede this just because there is pressure on building land is like taking down flood defences in case they get damaged in future floods! It negates the vision and those who had the good sense to see the future threat to our countryside.

As such, I strongly object to the erosion of green belt land at Send by taking out of the Green Belt Send Business Park (Policy 2 at paragraph 4.3.15), developing Land at Burnt Common (Policy A58), building on Garlick’s Arch (policy A43) and building at Clockburn Nursery, Tannery Lane (Policy A42).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Send Business Park (Policy 2 at paragraph 4.3.15):

To develop this site further would be to the detriment of what is a pleasant and predominantly rural stretch of the River Wey navigation.

I often cycle use Tannery Lane as part of a recreational route I use and appreciate, therefore, just how unsuitable Tannery Lane is for Commercial Traffic being a narrow country lane with poor access at both ends.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Dear Sir/Madam,

Proposal to remove the Horsleys from the Green Belt - The "exceptional circumstances" required before taking this action have not been demonstrated.

Extension of the boundaries of the Settlement areas of the Horsleys - No sound reasons have been given for the proposed changes, which seem to be aimed solely at increasing the land available within the settlements for future additional development.

Infrastructure already overloaded - The local Schools are full. Medical facilities stretched. Drainage is inadequate, roads & car parks are overloaded with little or no scope for improvements.

Station Parade is designated a "District Centre" - This "classification" results from a complete misreading of the nature of the facilities in the village centre & would inappropriately target the area for future urban developments.

Development of over 2,000 house village at Ockham (former Wisley Airfield) - The impact on the Horsley villages of such a huge mixed housing, retail, commercial, traveller & schools development, under 2 miles away, would be enormous. The plan also includes extensive developments at Burnt Common (400 houses & commercial developments) & Gosden Hill Farm, Burpham (2000 houses & mixed use developments).

Major doubt concerning housing numbers - The inflated number of new houses proposed arises from a Strategic Housing Market Assessment (SHMA) that was generated by a consultant's mathematical model which is not revealed in the plan. Nor, apparently, to Guildford Borough Council (GBC). This SHMA target housing number is then further increased by GBC to give a population increase which is almost 70% higher than the official national estimates for population growth in
the Borough. The scale of this increase has alarming results e.g. an increase of up to 35% in existing West Horsley households - greater than any other single area in the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/669   Respondent: 11023585 / Jean Walker   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

17.1 OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/670   Respondent: 11023585 / Jean Walker   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

18.1 OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability and
- flaws in the method for estimating the number of homes needed to support job growth.
• It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>1. I OBJECT to Gosden Hill development being in the Local Plan The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham. No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF. The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond. Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel. The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.</td>
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Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/1062  **Respondent:** 11023585 / Jean Walker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

15.1 OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).
The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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16.1 OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.
This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/2049</th>
<th>Respondent: 11023585 / Jean Walker</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8.1 OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/2046</th>
<th>Respondent: 11023585 / Jean Walker</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5.1 OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2047  Respondent: 11023585 / Jean Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6.1 OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2048  Respondent: 11023585 / Jean Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7.1 OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/2055  Respondent: 11023585 / Jean Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains Travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2053  Respondent: 11023585 / Jean Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2054  Respondent: 11023585 / Jean Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3 – Rural Exception Homes

I OBJECT. This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>PSLPP16/2050</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

9.I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

10.I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2051  Respondent: 11023585 / Jean Walker  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

11.1 OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2052  Respondent: 11023585 / Jean Walker  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
12. I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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3. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4.1 OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2042  Respondent: 11023585 / Jean Walker  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1.1 OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2043  Respondent: 11023585 / Jean Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2.1 OBJECT to the Borough Wide Strategy (Policy S2)

a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For
instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4566  Respondent: 11023585 / Jean Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4567  Respondent: 11023585 / Jean Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river
flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.
25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4568  Respondent: 11023585 / Jean Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3001  Respondent: 11023585 / Jean Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/590  Respondent: 11023585 / Jean Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1435  Respondent: 11023713 / Yuanxing Zheng  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to express my strongest objection to the proposed development plan in Normandy Flexoford (A46) area.

Normandy is a small village with only about 1300 houses, an additional 1100 houses will in effect double the village size which will impose enormous stress to an already very fragile infrastructure. The Wanborough railway bridge is in a very poor heath due to the existing heavy lorry traffic. It had to undertake a major emergency repair work only just over 1 year ago. We can not imagine how it can cope with double or triple the traffic if this new development were to go ahead.

The evidence to support an additional secondary school is not convincing at all. According to villagers’ own research, there are plenty spaces in schools around west of Guildford. It seems the sole purpose of this new school is to serve the A46 new development site requirements, which can not be used to justify the development proposal.

We have seen a clear statement from the Government stating that releasing land from Greenbelt for development can only be approved for exceptional circumstance. GBC’s proposal does not have any evidence to demonstrate it. There are many wild life in the village, their habitat areas have been reduced by 32 acres in the past few years. Reduced land further will impose major threats to the deer and many birds in this village.

For the above reasons, I object to the draft plan drawn up by GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/537  Respondent: 11023713 / Yuanxing Zheng  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Normandy and Flexford
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly support the withdrawal of Policies A46 and A47, the former being the so-called ‘strategic site’ that would have added 1100 extra houses to the village that would have irretrievably destroyed the character of Normandy and Flexford and would have imposed an impossible burden on the local transport and other infrastructure. This area contributes significantly to the ‘openness’ of the Green Belt in this area, as well as being high grade agricultural land, and therefore should be fully protected for the future.

I object to the ‘insetting’ of the settlements at Flexford, Normandy, and Walden Cottages, as well as the Traveller site at Palm House Nurseries (Policy/Site A49) and the Travelling Show-people site at Whittles Drive (Policy/Site A50) as this would mean is that they were no longer part of the Green Belt and could in future be developed subject only to normal planning regulations. Both sites are rated “High Sensitivity” in the Sustainability Appraisal 2017 (Table 10.1).

In summary, the removal of sites from the Green Belt should only be done for exceptional circumstances, so I am pleased to see that the Guildford Borough Council has recognised this specifically with regard to the proposals for policies A46 & A47.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3860  Respondent: 11023777 / Cynthia Parise  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following reasons:
1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is
allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I hope that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/2683  **Respondent:** 11023969 / Nik Proctor  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The New Local Plan

Objections to proposals Ref. 36, 37, 38, 39, 40, & 41

Nicholas Proctor of 12 Holmwood Close, East Horsley, Surrey KT24 6SS

I am extremely concerned about the extent of the proposals in your Local Plan as they affect our villages and the apparent attack on the Green Belt. My main objection is that your Plan will irrevocably change the character of the Horsley villages. I have lived in East Horsley for all my life and it is very understandable why it is such a sort after place to live. People are prepared to pay a premium for houses in this quiet rural setting. Other specific objections are as follows:

The dramatic rise in both houses and population of the villages by approximately 20% will overload an already stressed infrastructure. There is always a waiting period of about two weeks to get a doctor’s appointment. The local schools are oversubscribed. The Raleigh currently has about 30% of its students coming in from Effingham and Bookham. The Local Plan makes no provision in the Horsleys, as I could read, for the buildings that would be required to deliver services to new residents e.g. doctors surgery, schools, etc. The train service up to London is already over stretched in the rush hours. Often people further up the line have to wait for a later train because the carriages are completely full with people standing. This general overcrowding of the area on, roads, trains, etc. has a damaging effect on people’s wellbeing and general happiness. Although these are difficult to measure they are vitally important to the quality of people’s lives.

The effect so many more people from outside the village will have on the culture of the village. The Horsleys will become a small town. The development plans go against the protection of The Green Belt that was designed to protect rural villages and stop urban sprawl. It is extremely important for Surrey to retain its villages to make it an attractive area for people to live and visit. It is part of what makes South East England a jewel in the crown of this country.

There has been a significant rise in the volume of traffic over the last ten years or so. Very little has been done to address this issue and another 1000 cars (assuming about 2 cars per new dwelling) will be horrendous. It will also mean more potential for accidents. Many of the residents are elderly and find it difficult coping with so much traffic.

The expansion of the village has already meant that the local wildlife has suffered a loss of habitat. There are more dead animals on the roadside than there ever used to be. As a village gets more like a town there is more night time traffic which is more hazardous for the animals. This is currently before adding another 1000 or so vehicles.

If more housing is required it would seem more sensible to me to locate additional dwellings in and around the towns where those people are likely to work. This has the benefit of using existing brown field sites and cutting commuting traffic and so pollution.

Overall I believe this Local Plan is fundamentally flawed as far as the Horsleys are concerned. It might seem an easy option to build in the countryside at first but the effect on this area of outstanding natural beauty would irreparably destroy the area for the residents and the people that visit the villages.

Thank you for taking on board my objections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
As a resident of West Horsley, I would like to record my objection to the current version of the Local Plan, as outlined on your website.

My specific concern is the number of new houses that are proposed in or around the villages of East and West Horsley resulting in an increase of up to 35% in West Horsley households. This concern stems from the following observations:

- Where is the proven demand for houses in the village, from people who need to work here?
- If none, where then would the people living in these houses work? If not locally then each household would need one or more cars to transport the occupants to work.
- Queues on the A3 northbound in the morning, from Ripley to the M25, are already severe at rush hour.
- Similarly, queues southbound on the A3 towards Guildford, and on the slip roads into the town, are also high.
- Emissions and pollution from vehicles using these stretches of road will not be reduced if more people try and use it.
- There is less than adequate existing drainage in East Lane, Ripley Lane and The Street, all of which flood when there is exceptional or heavy rainfall. Building additional houses can only reduce the capacity of the ground to absorb rainfall.
- The existing schools and medical facilities are already stretched: we experience lengthy delays in getting a routine doctor's appointment at the Medical Centre.

I have no objection to selective development on underutilised sites but value the Green Belt in which I live and would like to see it remain as such.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the proposed development at Gosden Hill as 2000 additional homes will have a devastating affect on traffic flows in the area as well as removing significant Green Belt forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed development at Clockbarn Nursery in Tannery lane as this is in a flood risk area and the access on narrow lanes cannot cope with any increase in traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/162  Respondent: 11024225 / Julian Harnor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Garlick’s Arch proposed development because of the impact on already overcrowded local roads and services. Also, there will be increased flood risk in Send Marsh due to increased water run off into local stream. My home is already in a flood risk area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/294  Respondent: 11024225 / Julian Harnor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the erosion of Green Belt and in particular, villages being inset from the Green Belt, as this is an irreversible process affecting quality of life for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/295  Respondent: 11024225 / Julian Harnor  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the large number of additional homes, 693 per year for 15 years because the borough is already overcrowded with significant traffic congestion, air and noise pollution.

I object to any further development along the A3 corridor which is threatening an urban sprawl from the M25 to the Hogs Back with the villages being merged together.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2166  Respondent: 11024225 / Julian Harnor  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A42 change at Clockbarn in Tannery Lane because:

• The increase to 60 homes in place of 45 homes is 33% more and too much
• It ignores all the hundreds of previous objections made by local people
• It will worsen access and traffic problems in Tannery Lane and at the A247 junction
• It will make erosion of the Green Belt in our village worse
• It will make surface water flooding, which is already bad, even worse
• It will impact open countryside views from the River Wey Navigation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2167  Respondent: 11024225 / Julian Harnor  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43 change at Garlick’s Arch because:

- It ignores all the thousands of previous objections made by local people
- There is no proven demand for Travelling Showpeople plots in this location
- It is beautiful permanent Green Belt and no “exceptional circumstances” exist
- It will cause over-development of our village and the number of homes is excessive
- It is exquisite ancient woodland that existed at the time of Elizabeth I
- It will join up Ripley and Send and defeat the key purpose of Green Belt
- It is subject to frequent flooding and is currently a flood zone 2 allocation
- It is contaminated by lead shot accumulated over fifty years
- It will generate excessive traffic that will block up the local roads of Send and Ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2172  Respondent: 11024225 / Julian Harnor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A 58 at Burnt Common because:

- It was deleted from the 2014 draft because of all the objections made previously
- The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land
- There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a hugeover allocation of 10 hectares at Send in the Green Belt
- The impact on small surrounding roads will create traffic gridlock
- It will join up existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/656  Respondent: 11024225 / Julian Harnor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to inset Send Business Park from the Green Belt because:

It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
There is highly restricted vehicular access along Tannery Lane in both directions
Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:  PSLPA16/2787  Respondent:  11024257  /  Jenny Richardson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:  PSLPA16/2788  Respondent:  11024257  /  Jenny Richardson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the Strategic Housing Market Assessment (SHMA) figure of 693 houses per annum in the borough being too high (Appendix D).

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability and flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.
- The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.
- The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5768  Respondent: 11024257 / Jenny Richardson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brownfield site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site.

Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community
Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport.

With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4) It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/5770</th>
<th>Respondent: 11024257 / Jenny Richardson</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send.

Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard.

There has again been no Section 18 consultation on this.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11673  Respondent: 11024257 / Jenny Richardson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough. The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11670  Respondent: 11024257 / Jenny Richardson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
### Comment ID: PSLPP16/11671  Respondent: 11024257 / Jenny Richardson  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** (

I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2) Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Attached documents:**

### Comment ID: PSLPP16/11672  Respondent: 11024257 / Jenny Richardson  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** (

I OBJECT to the loss of rural employment (Policy E5) Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Attached documents:**

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Page 360 of 2855
**Comment ID:** PSLPP16/11689  **Respondent:** 11024257 / Jenny Richardson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/11681  **Respondent:** 11024257 / Jenny Richardson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability.

Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11686  Respondent: 11024257 / Jenny Richardson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF. The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.
The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day. Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development. The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London. The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3. Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11688  Respondent: 11024257 / Jenny Richardson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances."

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/11674  **Respondent:** 11024257 / Jenny Richardson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1) Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.
I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces. Many of the affected villages, such as West Clandon, already suffer from traffic congestion.

Further development around these villages will only result in more traffic and more parking problems. With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians. The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

10. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.
Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/11675  **Respondent:** 11024257 / Jenny Richardson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/11678  **Respondent:** 11024257 / Jenny Richardson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to poor air quality concerns (Policy P3)
Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11668  Respondent: 11024257 / Jenny Richardson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2).

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11669  Respondent: 11024257 / Jenny Richardson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11666  Respondent: 11024257 / Jenny Richardson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon.

The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2039  Respondent: 11024289 / Robert Manley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to voice my objections to the building of an unacceptably large number of new homes which Guildford Borough Council's draft local plan proposes to sanction in the parishes of East and West Horsley.

In 2014 a previous draft plan proposed to remove the green belt status which the two villages enjoy.

It was abolished after central government intervened to make it clear that green belt status could only be taken away from a village if "exceptional circumstances" could be established to justify doing so. To my knowledge no "exceptional circumstances" have ever been established and yet the new plan again attempts to remove the Horsleys' green belt status and facilitate the building of almost 600 properties in the villages immediately, followed by an unspecified and unlimited number of additional houses or flats thereafter.

600 is a very large number of extra properties for the two villages and, if built, would put great pressure on the limited amenities we currently enjoy (doctors and dentists surgeries, school places and the provision for care for the elderly etc.) That situation would be further exacerbated by the 2000 houses proposed for Wisley airfield just a couple of miles distant.

The villages lack the infrastructure to cater for so many new residents. Yet if more roads are built or widened and fields concreted over, the rural character of our community will be lost. In effect the plan's proposals put the cart before the horse by first removing the green belt status and then cramming in sufficient development to justify having removed it.

Finally, I seriously doubt that Guildford Borough Council can point to where, over the whole of Surrey, the new residents would find enough jobs to meet their needs. And even if they could all find work in London travelling there is very expensive. There is therefore a real danger that many new residents will discover that there is no work for them locally but that anything they can find in London does not pay enough to meet cost of travel to get to it. They would be marooned.

I believe that the local plan arises from a requirement placed on local authorities by central government to get more homes built to meet a national shortage. The objective is right but in my submission it is a mistake to build so many homes in areas such as the Horsleys which lack both infrastructure and employment. To do so would prove highly detrimental both to the new residents the existing community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to the proposal to build a large amount of houses on site A43 due to the land being Green Belt and also the affect it would have on the already overstretched infrastructure.

Also I object to a new junction with the A3 because it would create a new through route to Woking through Send, which is already very congested at certain times.

Also These major changes to the original plan need a full consultation.

Please make my comment available to the inspector

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I Object to proposal A44 Winds ridge, because this is a new site and is totally unsuitable for 40 new houses and two traveller site, because the road is very narrow, single track and already badly congested. Also this is a new site and is not included in the original draft The land also has permanent green belt status.

Please let the inspector see my views

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to Send being removed from the Green belt. Because it is a buffer between Guildford and Woking, I do not want the area to become a suburb. We need to protect the Green belt land for everyone to enjoy. It can never be replaced once it is lost. Look what has happened to the area around Woking; you could be in London. Please let my comments be seen by the Inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11748  Respondent: 11024385 / Alison and Peter Parrott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the land around St Bedes school being taken out of green belt land as this would mean an opportunity for developers to move in.

The land should be returned to land for everyone to use.

I would like my comments to be seen by the planning inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1385  Respondent: 11024385 / Alison and Peter Parrott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to a42 on the grounds that the amount of houses was already to much for the area and it has been increased. the roads and access is simply not good enough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to a43 because this is a massive over development of send and the green belt. Also the gap between Ripley and Send would be closed defeating the object of green belt land

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to a58 because the industrial sites that are available in the Guilford area are not being used. Also the extra traffic would cause major problems around Send

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the policy of inserting send business park from green belt because the access is very restricted in Tannery lane and an increase of development would only increase traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/975  Respondent: 11024641 / Penny Caswell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to removal of Send from the green belt, I feel there are enough empty buildings in Guildford & Woking town, that have been empty for many years, if you really need more houses please use your existing buildings and leave our lovely green countryside.

I object to the proposed interchange onto the a3 at burnt common this would be a nightmare with traffic being gridlock on the A247 where we will have 2 schools and there is no safe crossing by this school for our children, who a lot do walk to school.

I strongly object to more houses being built as we do not have the infrastructure for our schools, already they is not enough secondary school places for the children in the village with the house we already have???? where will they go????????

I object to all proposed sites in send as they were not included in the previous 2014 consultation. Green belt is meant to be permanent & not continually eroded

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7881  Respondent: 11024673 / Margaret Nicol  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I wish to object to the local plan.

I support the valid reasons given to you by the Guildford Residents Associations. Primarily it should not be considered without the infrastructure to support it

It appears that this is not being considered in conjunction with a plan for the centre of Guildford. This cannot be right.

Guildford is becoming a nightmare.

I hope common sense will prevail.

Please register my objections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/878  Respondent: 11024673 / Margaret Nicol  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to the proposals contained in the "final" local plan for Guildford Borough. In view of flawed new evidence Guildford's proposal for more than 12,426 homes (plus a buffer of 1,155 homes) is excessive and will result in needless loss of Green Belt and increased congestion.

I feel it is important to sort out the infrastructure first, then consider housing expansion. The infrastructure cannot cope with the existing population so it does not seem possible that it could cope with expansion of 20-25%.

Roads are already congested and frequently grid-locked. Expansion of the housing stock will not sort out the problem. I moved to Guildford in 1951 when it was a delightful market town. There have been too many changes which have sadly damaged it. Careful thought needs to be given before any further expansion is made.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1618  Respondent: 11024769 / Sarah Runton  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has not been open and transparent and is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3100  Respondent: 11024769 / Sarah Runton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7544  Respondent: 11024769 / Sarah Runton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the detrimental impact on transport, local roads and road safety. The proposed development of 2,068 homes would result in an estimated 4,000 additional vehicles. This will hugely increase congestion, particularly at peak times, on the narrow rural roads in Ripley, Ockham and the Horsley, and will only be exacerbated by the increase in wide vehicles including increased bus and HGV traffic.

This fundamentally contradicts the plan’s assertion that the development will encourage more cyclists and pedestrians. One heavy rainfall is all it takes to cause drainage to overflow and local roads to flood. These roads were built for minimum traffic and most don’t have pavements are badly lit and there is certainly no room for expansion to include any purpose built cycle lanes or designated cycle routes.

The A3 and the M25 are hugely congested at rush hour in the very area the plan proposes to build this substantial number of dwellings. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

The problem is further exacerbated by the lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

I trust that these objections will be fully considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6733  Respondent: 11024769 / Sarah Runton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
This fundamentally contradicts the plan’s assertion that the development will encourage more cyclists and pedestrians. One heavy rainfall is all it takes to cause drainage to overflow and local roads to flood. These roads were built for minimum traffic and most don’t have pavements, are badly lit and there is certainly no room for expansion to include any purpose built cycle lanes or designated cycle routes.

The A3 and the M25 are hugely congested at rush hour in the very area the plan proposes to build this substantial number of dwellings. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

The problem is further exacerbated by the lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

I trust that these objections will be fully considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16812  Respondent: 11024769 / Sarah Runton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking without substantial investment in cycle lanes and pathways as well as pavements. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional vehicles. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV traffic. This fundamentally contradicts the plan’s assertion that the development will encourage more cyclists and pedestrians. The danger this traffic will be to local cyclists and pedestrians is obvious to all who live in the area, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them). The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25.

Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I object to this plan because over 70% of new housing is to be built within the Green Belt. There is ample brownfield land in the urban areas that needs to be regenerated. This can be achieved without the need to encroach on protected Green Belt land. Once the Green Belt has gone, it has gone forever and blatantly ignoring it now gives license to continue to do so in future.</td>
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<td>I object to this draft Local Plan for the following key reasons:</td>
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I object to the disproportionate allocation of housing in this particular part of the borough. Over 23% of the plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys. These are small villages with distinct character and do not have the infrastructure to support the massive increase in dwellings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/16811</th>
<th>Respondent: 11024769 / Sarah Runton</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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I object to the disproportionate allocation of housing in this particular part of the borough. Over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<thead>
<tr>
<th>Comment ID: pslp173/401</th>
<th>Respondent: 11024769 / Sarah Runton</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Horsley North</td>
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</table>

I also object to the Local Plans proposal for 400 dwellings in West Horsley.

There is still a flagrant disregard of Green Belt land that was introduced to stop urban sprawl. The reduction in the number of homes proposed in the Green Belt initially is a good thing but it does not go far enough.
There appears to be no change to Guildford’s projected housing growth of almost 25% by 2035. The Office of National Statistics is almost 50% less for the same period, yet figures based on this huge discrepancy surely cannot be justified for development of this size.

I object to no changes being proposed since the 2016 Consultation to insetting West and East Horsley from the Green Belt. There is need for new dwellings but on a much more considered approach that is in line with the Parish Council’s development plans and sympathetic to the current infrastructure and feel of the villages.

Nothing has been proposed since last year’s Consultation to improve the sustainability of the West Horsley development sites and thus meet National policy requirements.

The existing infrastructure is stretched under current demand for its services. The local primary and secondary schools have had plans for necessary rejected, the run off for sewage and drainage is low meaning localised flooding occurs in extended rainy periods and sewage pipes get blocked.

Local train station carparks are full at peak times and buses and other large vehicles travelling east through the village stop the traffic due to lack of room for cars to pass the same stretch of road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>pslp172/3107</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A35</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

The proposal is based on flawed details particularly regarding transport to train stations and the small roads, ill suited to a development of this size. Clandon has an A road through it, Ockham is adjacent to two huge roads that are already severely congested with smaller artery roads of very poor quality and poorly lit. Of all the proposals for a large development it is the least sustainable strategic site identified by the Council because of the constraints on the site and the physical location.

It is also further away from rail stations than any other considered site and uses ‘as the crow flies’ distances rather than distance by road. It is also important to point out that whenever a bus goes through Horsley towards Horsley Towers that any cars passing on the other carriage way often either have to stop or mount the pavement to allow space to pass, severely impacting local safety to residents and drivers.

There is not enough employment opportunities on the site meaning the majority of those working will have to drive to reach their destination or to the local stations. The M25 at this junction is one of the busiest in the country and the A3 is also severely congested at this point during rush hour. A development so close to this area will only exacerbate what is already a severe traffic problem.

There seems to be a disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels. Studies from bodies such as the World Health Organisation clearly outline issues in children’s development in particular in areas of poor air pollution.
There are also numerous inaccuracies. For example in S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound and its assumptions flawed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/548  Respondent: 11025281 / Alan Willmott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I object strongly to the proposed submission. The documents supporting this are confused and inadequate. It has been extremely difficult to obtain accurate and objective information from the council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/549  Respondent: 11025281 / Alan Willmott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

The plan fails to follow NPPF guidance regarding Brown Field sites

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/550  Respondent: 11025281 / Alan Willmott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I believe the proposed plan will be to the detriment of both an AONB and the green belt. It will substantially impact upon Guildford as being a desirable area to live in, focussing primarily on economic concerns not qualitative considerations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/551  Respondent: 11025281 / Alan Willmott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I can see no evidence of GBC considering the proposed developments in Aldershot which will have a significant impact on Guildford especially on road traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/552  Respondent: 11025281 / Alan Willmott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I am not qualified for this role

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I wish to lodge my strongest opposition to the totally disproportionate and wholly unjustified Guildford Borough Council's plans to dramatically increase the population size of West Horsley village.

To increase a village population by in excess of 30% without any thought to the infrastructure and the additional strain placed on already strained local services, roads, schools/education, transport, drainage is outrageous!

The impact of 450+ new homes and circa 900 additional cars that will be aded to the village roads, will seriously change the character of the village and will put lives at risk, whether this is local children who cycle or walk to School or the many hundreds of cyclists who use these Country roads as part of their regular road training route.

Numerous surveys conducted by parish council and local groups show a need and tolerance for no more than 50 - 100 new homes. Such numbers could be accommodated in around and within existing housing areas and if planned and executed sensitively, will have hopefully minimal impact on the character and practical functioning of the village.

Please reconsider your proposal for 450+ new homes in West Horsley and take a more measured approach in line with feedback expressed by the existing residents.

The people of West Horsley are not being unreasonable. We understand that some increase in housing stock is needed, as current residents wish to stay on in the village and new and young people wish to join our community. However, to increase the population of West Horsley by the numbers of people and cars you propose would destroy the character and effective functioning of the village for both existing and future residents.

The state of the existing roads is testament to the fact that insufficient funds have been made available for many years on repairing potholes and or sorting out the continual flooding and surface water drainage issues. Increasing the housing by the ridiculous numbers proposed will see an already creaking infrastructure crumble and fall apart completely!

I sincerely hope that you will reconsider your proposals as they stand and that we can arrive at numbers which the West Horsley residents can embrace as a positive outcome for an organically evolving village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I would be grateful if you would:

- Acknowledge receipt of this letter by individual, rather than any automated email response you may have put in place.
- Ensure my letter is shown to the planning inspector
- Respect my privacy and appropriately sanitize out my personal details (including email address) prior to any publishing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPA16/3936</th>
<th>Respondent:</th>
<th>11027137 / I Pennells</th>
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<tr>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Whilst I appreciate some small developments are required, I would like to object to extent of the development proposals on the following grounds:

With respect to all sites in the village of Send and close proximity (A25, A35, A42, A43, A43a, A44) Send village is already undergoing considerable change, with the redevelopment of Vision Engineering’s site. Surely this large development should be completed to allow the impact on the village be assessed before other large developments are approved? In addition, developers are routinely purchasing single properties and replacing them with multiple dwellings.

The layout of Send village does not allow for the existing arterial roads to be widened to allow, in a lot of cases, for roads to be comfortable 2-way roads. A lot of the roads are not full width, often requiring vehicles to take it in turns in passing. Increasing traffic exacerbates this issue potentially making drivers to take unnecessary risks. Currently, a number of the roads are often used by large vehicles that are not suitable for the narrower roads causing unnecessary risks to all other road users. Except for the through road through the Send village and Send Marsh, the majority of roads are not lit and do not have pavements discouraging residents to walk short distances rather than use a car adding to the congestion.

I object to Send village being removed from the Green Belt. The green belt is to provide a buffer between Send village becoming joined to Guildford and Woking. Send Village would be at risk in losing its village identity.

I object to the Local Plan due to the village would be impacted on for years to come if planning permission was granted. Local existing neighbours would also be disturbed for years during the construction. Local amenities would also be put under unnecessary demand and pressure as outlined below:

Community facilities

- These developments will put additional pressures on existing facilities including the education facilities and medical facilities which are already stretched.
- Groups and clubs held for all ages will be stretched, and in some cases may not be suitable to accommodate the additional demand.
- The children’s recreation facilities are located directly next to Send Road. Any increase in the traffic on this road will directly increase the pollution exposure to those using the recreation facilities.
Utilities

- Additional demands on the currently stretched telecommunications, resulting at times, in intermittent internet services.
- Additional demands on existing utilities such as water, gas, electricity, sewage which may also lead to intermittent services.

Traffic

- Damage only collisions have been observed with vehicles using Tannery Lane cross roads junction and the signalised cross road with Send Marsh Road. The developments in the area will further increase the risk of additional collisions.
- During the rush hours, traffic is already heavily congested throughout village especially at the junctions and on the approaches to the roundabouts at either end of the village.
- Additional pressures on the already over stretched local transport network especially the A247 increasing the pollution, congestion.
- Additional pressures on parking in the village and surrounding area
- The only public transport (buses) serving for the residents of Send has experienced cuts in the last bus review. The bus service does not run at sensible frequencies and at times to allow commuting and linking in with adjacent public transport facilities such as the train stations in Guildford and Woking. Surely by reviewing and improving this service would increase patronage to make the service self-funded and reduce traffic on the already heavily congested local roads.
- Link roads surrounding the village such as Send Hill, Potters Lane, Tannery Lane, Wharf Lane, and Papercourt Lane are not wide enough to accommodate two-way traffic flow safely and are often used by large agricultural equipment accessing adjacent land. This is further exacerbated in residential areas where additional vehicles may be parked on the road side or undertaking unexpected manoeuvres accessing properties.
- Congestion and narrow lanes with increased traffic flows may unnecessarily delay already over stretched emergency services.
- Limited footway facilities for non-motorised users to access the development sites and community facilities increasing the risk of collisions
- Limited cycle facilities to access adjacent towns and community facilities forcing cyclists to share narrow road space with motor vehicles. Often causing risk to both parties with drivers trying to pass cyclists on blind corners.
- Any incidents on the surrounding A3, especially the northbound forces an increased traffic flow through the village. Especially when closures are implemented, something that is happening with increased frequency. This brings the entire village to grid lock.
- The increased traffic flow on Send Road would be likely to necessitate the roads parking restrictions increasing. This would directly affect existing local resident and businesses.
- The A3 section between Burnt Common and M25 already has a bad safety record and is subject to regular highly disruptive congestion. The increased traffic volumes, particularly using the A3 is likely to increase the use of the Potters Lane junction with the A3. This is likely to directly affect the safety of this section and risk increasing disruption through increased incidents.

Retail

- Insufficient retail facilities are provided for the village. Increasing the number of dwellings further will put further demand on them. Residents currently are required to either travel to a supermarket in adjacent towns or rely on deliveries.

Environment

- Flooding is a regular occurrence in the area especially recently during the winter months in 2013. Draining flood water is limited in already saturated areas. Building on these areas increases further flooding through restricting permeable surfaces to drain excessive rainwater.
- Increased pollution through additional traffic and construction

Crime and Public Safety:
• The village already suffers from regular targeting by travelling criminality. Growth of the village will only serve to make it an increased target for such.
• The growth both in residential and commercial will put more strain on existing emergency services. The associated increased congestion would only serve to make their response targets harder to achieve and as such putting residents and public safety at direct risk.
• No reference appears to be made to any consultation with any services around counteract these risk.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7342  Respondent: 11027137 / I Pennells  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A25 Gosden Hill Farm, Merrow Lane, Guildford

• The local adjoining roads do not have sufficient capacity (especially at rush hour) to take additional traffic that would be generated by this development.
• Public transport is not sufficient meeting demand of potential additional passengers to encourage vehicles to be left at home to undertake local journeys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7343  Respondent: 11027137 / I Pennells  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A35 Land at former Wisley airefield, Ockham

• The local adjoining roads do not have sufficient capacity (especially at rush hour) to take additional traffic that would be generated by this development.
• Public transport is not sufficient meeting demand of potential additional passengers to encourage vehicles to be left at home to undertake local journeys.
A42 Clockbarn Nursery, Tannery Lane, Send

- The access to the site is not adequate for regular traffic and the potential volumes during construction and after construction.
- Tannery Lane is unlit and is far too narrow and bendy for 2-way traffic without footpaths, especially with the other planning permission granted for 64 apartments and a Marina further along Tannery Lane.
- The junctions joining adjacent roads are also not sufficient to take additional traffic regularly.
- The local adjoining roads do not have sufficient capacity (especially at rush hour) to take additional traffic that would be generated by this development.
- The risk of the land flooding putting housing in this area at risk and displacing the risk to adjacent existing housing unnecessarily.
- Public transport is not sufficient meeting demand of potential additional passengers to encourage vehicles to be left at home to undertake local journeys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
A43 Land at Garlick’s Arch, Send

- The land is floodplain for Clandon Stream, putting housing in this area at risk of flooding as well as housing further up and down stream due to no replacement floodplain being provided.
- Area of ancient woodland and associated wildlife will be impacted on by the developments.
- The local adjoining roads do not have sufficient capacity (especially at rush hour) to take additional traffic that would be generated by this development.
- The proposed industrial usage is not required. There are currently empty units next to the existing industrial area and the nearby Slyfield industrial estate.
- Public transport is not sufficient meeting demand of potential additional passengers to encourage vehicles to be left at home to undertake local journeys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7346  Respondent: 11027137 / I Pennells  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A43a Land for new slip roads to / from A3

- The local adjoining roads do not have sufficient capacity (especially at rush hour) to take additional traffic.
- The A3 is already stationary especially northbound during the morning rush hour. Providing another northbound slip road would attract additional traffic to the area attempting to join the A3 without success. Currently vehicles are often observed exiting the A3 at Burnt Common and queuing through Ripley before re-joining the A3 ahead of the queue.
- Burnt Common roundabout is already a bottle neck for traffic especially in the morning rush hour, often taking 10-15 minutes in the morning to cross the roundabout from Send village. Additional traffic would exacerbate this delay further increasing pollution and traffic noise.
- This section of the A3 has been highlighted as an area of high collision rates without creating a further risk of additional slip roads in close proximity to the slip roads accessing Burpham and Ripley Services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7347  Respondent: 11027137 / I Pennells  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44
A44 Land west of Winds Ridge, Send Hill, Send

- Send Hill is unlit and is too narrow and bendy for 2-way traffic without footpaths.
- The local adjoining roads do not have sufficient capacity (especially at rush hour) to take additional traffic that would be generated by this development.
- The approach to Potters Lane is not wide enough, bendy, and is on a gradient causing problems vehicles to pass safely without reversing around bends at times blind to other approaching vehicles.
- The school bus for George Abbott School operates along the road and is often observed struggling to pass vehicles parked on the road. This would be worse if this development was given the go-ahead.
- The land is currently regularly used local amenity where a number of footpaths meet, making it a desirable walking route.
- The subsoil of the proposed site contains documented unsafe landfill waste registered at GBC.
- This site is regularly monitored by permanent monitoring equipment. Surely by disturbing this site puts local residents health at risk by the unknown materials located in this landfill. Methane gas is one of the elements monitored regularly.
- To provide the proposed housing quantities the provision would not be in keeping with the surrounding area.
- The access to the site is not adequate for regular traffic and the potential volumes during construction and after construction.
- Such a high number of housing in an area with poor public transport and non-motorised user facilities increases the risk of vehicles accessing these properties being displaced parking on an already narrow Send Hill. This is issue would be further exacerbated at school times when school traffic parks solidly half way up Send Hill.
- Development in this location would impact on the local remaining countryside including nature reserve and waterway.
- Public transport is not sufficient meeting demand of potential additional passengers to encourage vehicles to be left at home to undertake local journeys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I was born in Guildford, as were my parents and all four Grandparents.
I am appalled at the new local plan and wish to object to it in the strongest possible terms.
The amount of proposed Greenbelt land to be given up for development is scandalous and clearly against the wishes of the vast majority who live and work in the Borough.
I strongly urge the council to reconsider this part of the plan and to prioritise Brown field land for both residential and commercial development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6153  Respondent: 11027201 / Stephen Clarke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to register my sincere objection to proposed building on Greenbelt land within the Borough.

It is supposed to be protected as a matter of National and Local policy and at a time of perceived pressure to build new homes, its purpose of preventing urban sprawl is more important than ever.

Furthermore, it seems that Brownfield sites within the Borough are sufficient to provide all reasonable housing needs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6156  Respondent: 11027201 / Stephen Clarke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the 2016 Draft Local Plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2155  Respondent: 11027265 / Jonathan Ingram  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the proposals in the Draft Local Plan for the following reasons:

I live in East Horsley and find the roads to be very dangerous with even the current amount of traffic let alone if we get more traffic due to the increased population in Horsley and the surrounding areas. I notice there is a development proposal at the Thatchers Hotel on the Guildford Road East Horsley. This area of road is particularly dangerous as it has a blind corner and a sharp bend and many people having to turn right out of Ockham Road South onto it, all within the space of about 50 metres.

I object to all the proposals at the sites in West Horsley and East Horsley for the reasons of the local transport infrastructure simply not being able to cope with the huge demand the increased numbers of population will place upon them. In particular the stretch of the A3 from the M25 junction at Ockham past Wisley, past Burpham and all the way along to Guildford experiences many collisions. A new junction will increase numbers of traffic on this dangerous road.

In addition as a daily commuter into London from Horsley station I do not see how this small village station can cope with the increased demand from literally potentially thousands of extra commuters every morning and every evening travelling to and from the proposed sites in The Horsleys and at Wisley Airfield Ockham. The new Guildford Local Plan states expressly that regarding Effingham Junction station it is “not considered sequentially preferable or sustainable to direct office development to these locations”. See extract below. If it is not considered an adequate station where will the commuters residing at and office workers working in Wisley Airfield Ockham get the train to and from? Surely not Horsley as this will be having to cope with extra commuters from the 535 proposed new homes in the Horsleys.

4.4.17 For the purposes of the sequential assessment the train stations at Clandon, Chilworth, Gomshall, Shalford and Effingham Junction, will not be considered to be transport interchanges because of their locations within the Green Belt, AONB or the isolated nature of the station away from the village or centre. We do not consider that it is sequentially preferable or sustainable to direct office development to these locations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2866  Respondent: 11027457 / Nigel Austin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt, which needs to be regrown on protected brownfield land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsley's (of which 65% is allocated to FWA/TFM, an area that at present has only 3% of the population of GBC).
- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- I object to the detrimental impact on transport, local roads and road infrastructure. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest

1. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see
both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

- I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd.'s (WPI) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/3748</th>
<th>Respondent: 11027489 / J Pamplin Agent:</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A26</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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<tr>
<td>My feelings are the same for the proposed development at Blackwell Farm on the Hogs Back. Loosing this rural landscape will be totally devastating to Guildford.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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Having lived in Normandy since 1957, moving here with my husband and bringing up our two children in the village I am outraged that the beautiful fields between Westwood lane and Glaziers lane are proposed to be built on.

I don’t think you have considered the impact on the local area. I live on Westwood lane and know how busy the road is today the thought of 1000+ houses and a school built and more traffic to the village. That is without traffic from the expanding neighbouring villages. It would be impossible for those who live in the village. The road has a narrow railway bridge that could not be widened without the removal of nearby properties. Glaziers lane is much the same. I have enjoyed living in this rural village for nearly 60 years.

Has anyone considered the flood risks to the area and building on all this beautiful Green belt land. I and my family have enjoyed living in the village of Normandy this unjustified development of housing and large school would threaten the wildlife and landscape. This would be detrimental to my health and wellbeing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8027  Respondent: 11027489 / J Pamplin  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am hoping that my six grandchildren will benefit from the Green belt I have enjoyed and strongly object to this unjustified proposed development that will destroy our rural environment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8026  Respondent: 11027489 / J Pamplin  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I consider the local housing numbers to be too high in the draft local.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comments specific to Horsley Villages area

As a resident of the Horsley Villages (I specifically use this description since, despite the language and descriptions used in the Plan, it is very difficult to overstate how closely East and West Horsley are connected and interdependent on each other, a point which is not fully recognised in the documentation) my comments largely relate to the policies in the plan which would affect this area.

I am aware that there is a general pressure for new housing stock to meet many different needs and supporting facilities. National planning guidance advises that villages should only be included in the green belt if the open character of the village makes a contribution to the openness of the green belt. West Horsley clearly has a different character to East Horsley and it should continue to be ‘washed over’ by the Greenbelt. With regard to East Horsley I appreciate that the ‘open character’ is less obvious, however whilst removing the green belt wash over for East Horsley within the existing settlement boundary might be one way of contributing to the additional housing required I think the addition of several areas specifically for development (by way of an amended settlement boundary and specific designation of these areas for development) will so radically change the nature of the village that this cannot be what is envisaged by a simple removal from the green belt wash over. Also I cannot accept that all of sites identified for development in East and West Horsley need to be included in the plan. Whilst it is true that the plan is intended to cover a long timeframe, and not all development would take place at one time, GBC will be making decisions which in the longer run would irrevocably change the character of the Horsley area if the plan were to be implemented as it is currently drafted.

The inclusion of all the areas identified would also put intolerable pressure on existing local facilities. I am sure GBC will be getting plenty of feedback from other Horsley residents, which I would also echo, to say that the primary school, health and parking facilities within the East and West Horsley area are already operating at capacity. There is no mention of including additional primary schools or health centres in the potential usage of these sites – the addition of the proposed housing density across all these sites with no such additional provision of school places or health care is bordering on the irresponsible and dangerous, and would indicate that GBC whilst obsessed with planning for housing has not rationally considered its other duties to the residents of the borough.

I quote from my previous letter in the consultation period

“At present the descriptions of the possibly uses for the areas in West Horsley only relate to housing and do not include uses for public facilities such as schools and health resources, surely this cannot be right? The consultation document at a general level indicates that appropriate resources would be approved in planning terms in the future, but I feel if an area of land were to be approved for use in a public way such as this, then it should be being brought forward for consultation now. In the Horsley area it is clear new health facilities and a new primary school facility at the very least would be needed if all the areas were adopted.”

As I say, no attempt has been made to address these points in the published draft plan and I feel GBC has failed in its duty to East and West Horsley residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Wisley Airfield

The inclusion of the Wisley Airfield site for development in the final draft plan does not seem to have had any impact on the number of areas included in East and West Horsley. I cannot follow this reasoning; clearly the Wisley Airfield development would have a significant impact on East and West Horsley, even given the provision of an additional doctors surgery and primary school at the Wisley site. There would in particular be increased traffic on the local roads. I cannot believe that the GBC has looked at the width of the Ockham Road North and South and considered the issues of increased construction traffic if all sites are developed and the general increased car usage going forward; the new denizens of Wisley will not stay in the new development for all their shopping, work transport and leisure needs and account must be taken of the additional impact on East and West Horsley. I do not think the new draft plan as it stands reflects this and so is defective. If the number of sites for development in Horsley had been reduced in consideration of the Wisley site being included it would have shown GBC applying some type of rational balance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15513  Respondent: 11027649 / Phyllis Charteris-Black  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Insetting of East and West Horsley

I made the point in my original letter that the ‘insetting’ of certain villages, instead of them being ‘washed over’ by the Green Belt, and changes to the Settlement Boundaries of certain villages, were major and important changes that could significantly impact the future of the villages concerned and I still believe that there was not sufficient prominence given to this issue in the Issues and Options document and so the consultation process was therefore flawed and so the present new Proposed Submission Local Plan cannot be relied upon as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2709  Respondent: 11028257 / David Conisbee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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<tr>
<td>I object to the lack of evidence for the alleged housing needs</td>
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<td>I object to the erosion of the green belt</td>
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<td>I object to any in setting of any villages from the green belt</td>
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<td>I object to the over development of any one area in the borough</td>
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<td>I object to the limited consultation period</td>
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<td>I object to the last minute inclusion of new sites with less than 14 days notice</td>
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<td>I also object to the proposal to build 45 houses at Clockbarn Nursery. Tannery Lane is far, far too narrow to take any more traffic. Living directly opposite this road I can inform you that this junction is already far too hazardous for vehicles trying to join the main road. Any additional traffic would simply make the situation even worse</td>
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The traffic situation in Send is already ridiculously high and as a result I object to the proposal for a new interchange with the A3 at burnt common. The village simply cannot handle an increased level of traffic which such proposal would bring. The whole village would become gridlocked and impossible for those families living here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6877  Respondent: 11028385 / Philippa Lawrence  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Following the recent plans I am writing to object to a number of the proposals listed.

I deeply object to the proposal for the Send Green Belt to be removed. As far as I was aware central government and local councillors gave clear election promise that this land would be protected. Loss of this land will mean developers will be quick to take advantage and this is something that certainly needs to be avoided. This belt provides a buffer between Woking and Guildford which prevents it from becoming one conurbation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/596  Respondent: 11028481 / Emma Rowland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have 4 key reasons for objecting to these plans:

I OBJECT TO THE LACK OF SOUND EVIDENCE BEHIND THE LOCAL PLAN

- I OBJECT to the proposal to build 4,485 new homes as planned in the policies listed above. Housing numbers from the Strategic Housing Market Assessment 2015 (SHMA) are highly dubious. These include an inflated number of foreign students and an unsubstantiated demand for new homes within the local area. This is even before the EU referendum result, which will inevitably impact on demand for housing in the area.
- I OBJECT to the lack of transparency in justifying the requirement for both new homes and the industrial developments. There has been no public scrutiny of the SHMA and even local councillors and Parish Councillors have not been able to review the numbers. In fact, the SHMA model has been calculated by a contractor on
behalf of GBC and that the resultant commercial sensitivity of this data prohibits wider review. This lack of transparency builds mistrust in the basis for the GBC numbers and suggests that they may be based on unrealistic data.

- **I OBJECT** to the inflated demand for housing in Send and Ripley. The total of 13,860 houses in the local plan is exaggerated. Even with a population growth of 20,000 in the plan period, based on a supposition of 2.5 people per home, the number should be no more than 8000. This suggests that GBC are intending that the Borough will be building homes to meet the need of other areas, such as Woking. Rather than destroying the Greenbelt, other brownfield sites should be sought in urban areas, even if they are outside the Borough. If not, Send and Ripley will become a conurbation of Woking and Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/595  Respondent: 11028481 / Emma Rowland  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**I OBJECT** to the Guildford draft plan and its impact on the villages of Send and Ripley. In particular I object to plans a25, A35, A42, A43, A43a, and A44. There are many reasons for objecting to each plan individually, but in fact they should be considered as one entity since they will have a detrimental effect on the villages in their entirety.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1791  Respondent: 11028481 / Emma Rowland  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**I OBJECT TO THE IMPACT ON THE INFRASTRUCTURE AROUND THE VILLAGES**

- **I OBJECT** to the impact of the Local plan on the local infrastructure. The roads around Send and Ripley are already congested and cannot cope with the current needs. The Local Plan does not incorporate a detailed transport infrastructure strategy that would demonstrate how the road network would support the additional pressure on the roads and other amenities if the proposed development went ahead. The plans to improve the A3 are years off (2025 – 30) and, even if they were implemented, would be preceded by years of gridlock on the
local roads. Plans to improve local roads (ref LRN20, specifically Send Road and Send Barns Lane) through an investment of £1.5m will be woefully inadequate to cope with the increased traffic.

Additionally, increased traffic through the villages will increase the hazards along the main roads, particularly pedestrians, especially children (using the Send School or catching buses to Guildford schools) and the increasing number of cyclists. This will be exacerbated by HGVs accessing the planned industrial units at Garlick’s Arch.

- **I OBJECT** to Policy A43a (Land for North facing slip roads to/from A3 at send Marsh/Burnt Common) This would necessitate a 4-way junction at Burnt Common and would inevitably increase the amount of traffic using the local roads in Send. This junction would worsen the problem of drivers using Send as a cut through from Guildford to Woking on local roads that are just not intended for this purpose. As a resident, I am amazed that there hasn’t yet been a serious accident as drivers use Potters Lane for just this purpose with little regard for the 30mph speed limit.

- **I OBJECT** to the proposed development of Gosden Hill Farm (Policy A25) and its inevitable impact on the roads around Send. Despite assurances of an additional railway station, commuters will utilise the opportunity to leave the A3 at the existing Burnt Common roundabout and travel on the faster Woking to Waterloo line, rather than use the slower Guildford line.

- **I OBJECT** to the proposed developments opposite Winds Ridge (policy A44) and Clockbarn Nursery (policy A42) due to the impact that the additional traffic will have on small local roads. The first of these will increase the traffic leaving Send Hill onto Potters Lane at what is already a dangerous junction on very narrow lanes. Meanwhile, Send Road is already frequently blocked by HGVs trying to turn into Tannery Lane; this can only be made worse by additional traffic using the same road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT TO THE IMPACT ON THE GREENBELT STATUS OF THE VILLAGES

- **I OBJECT** to GBC’s plan to remove Send and Ripley from the Greenbelt. The precious Greenbelt is not just a ‘nice to have’, but is an inalienable public good including space for rural leisure and tourism activities, flood control and benefits to public health. Once the greenbelt is built on, it will never be reinstated. The Local Plan seems to be prepared to ‘ride rough shod’ over the Greenbelt, even to the extent of losing ancient woodland at Garlick’s Arch.

- **I OBJECT** to GBC’s plans to allow ‘insetting’ the villages from the Greenbelt and infilling within village boundaries. This will erode the pockets of Greenfield sites around Send and Ripley and will result in an urban sprawl, effectively linking Woking and Guildford. I understand, and support, the appropriate use of brown field sites to build additional housing as required for the local population. However, the Local Plan appears to be taking the easy and cheaper option, of eroding Greenbelt, rather than actively searching for opportunities within urban Guildford where the infrastructure is already in place to support the resultant increase in population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT TO THE FACT THAT GBC HAVE NOT FOLLOWED THE CORRECT PROCESS

• I OBJECT to GBC adding Garlick’s Arch to the plan at only 13 days before the 24th May discussion of the Local Plan by GBC. The fact that this was ‘last minute’ was admitted by Mr Spooner at the Send Parish Council Meeting on June 14th. This site presents a significant change to the regulation 18 consultation in 2014, and therefore should have been fully debated, rather than accepted through a shortcut of Regulation 19. The fact that GBC have been ‘gifted’ the land to build the slip road to the A3 (policy A43a) in return for the inclusion Garlick’s Arch leads to cynicism and doubt that due process is being followed.

• I OBJECT to the disregard that GBC have shown to the concerns of local residents through previous ‘consultation’ processes which suggests that this one will be no different. Since 2014 GBC have changed every major site in Send proposed for development and now want to add a massive new road junction. The 2014 proposal for 430 houses went down in April 2016 to 185 and has now gone up to 485. This is in spite of a huge amount of effort by local residents to give the requested feedback to the previous plan. Naturally people are tired of repeating the same objections on seemingly deaf ears, but GBC should not conclude that the proposals have public support.

Overall, I OBJECT to the Local Plan. I would like these comments to be seen and considered by a planning inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I have been a resident in Send for over 20 years and have seen how strongly local people feel about the proposed changes to our village. This included raising a large proportion of the objections to the previous plan as well as electing two Borough Councillors who primary objective is to save Send’s Greenbelt status. However, it appears that none of these objections have been taken into account at all. If anything Send seems to have been unfairly penalised for this activity with the inclusion of even more development in the latest version of the plan, making things even worse for our village.

Overall the proposed changes will have a huge detrimental effect, with particular impact on traffic and other facilities, in addition to the removal of the irreplaceable Greenbelt protection that parts of our village enjoy. I have detailed my objections to specific policies below, but having drawn a - somewhat rudimentary- map of all the proposed development the impact of the changes can be seen in their entirety (See attachment) This map does not illustrate the additional impact on traffic and other infrastructure from other proposed developments such as Gosden Hill, which will compound the issues with local roads and other facilities which are struggling to cope with the local population as it is. In addition, there appears to have been minimal effort to development existing brownfield sites in and around Guildford. This is evidenced by recent redevelopment of land such as the old Fire station and the Waitrose in the centre of Town. Both these sites, and many others, could have been used for residential development instead of more retail space, with far less impact on the local infrastructure and none of the Greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Entire plan - Send.JPG (2.9 MB)

Comment ID: pslp172/4245  Respondent: 11028481 / Emma Rowland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Clockbarn Nursery, Tannery Lane, Policy A42

Now 60 homes in place of 45 homes previously

I object to the Policy A42 change at Clockbarn in Tannery Lane because:

- The increase to 60 homes in place of 45 homes is 33% more and too much]
- It will worsen access and traffic problems in Tannery Lane and at the A247 junction
- It will make erosion of the Green Belt in our village worse
- It will make surface water flooding, which is already bad, even worse
- It will impact open countryside views from the River Wey Navigation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4246  Respondent: 11028481 / Emma Rowland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Garlick’s Arch, Send Marsh, Policy A43.

Now 400 homes and 6 Travelling Showpeople plots

I object to the Policy A43 change at Garlick’s Arch because:

- It ignores all the thousands of previous objections made by local people
- There is no proven demand for Travelling Showpeople plots in this location
- It is beautiful permanent Green Belt and no “exceptional circumstances” exist
- It will cause over-development of our village and the number of homes is excessive
- It is exquisite ancient woodland that existed at the time of Elizabeth I
- It will join up Ripley and Send and defeat the key purpose of Green Belt
- It is subject to frequent flooding and is currently a flood zone 2 allocation
- It is contaminated by lead shot accumulated over fifty years
- It will generate excessive traffic that will block up the local roads of Send and Ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4247  Respondent: 11028481 / Emma Rowland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Burnt Common, London Road, Policy A58.

Now a new allocation for a minimum of 7,000 sq m of industrial or warehousing

I object to Policy A 58 at Burnt Common because:

- It was deleted from the 2014 draft because of all the objections made previously
- The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land.
- There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt
- The impact on small surrounding roads will create traffic gridlock
- It will join up existing villages and defeat the purpose of the Green Belt
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2550  Respondent: 11028481 / Emma Rowland  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt, Policy 2 at paragraph 4.3.15

Send Business Park now taken out of the Green Belt altogether

I object to the proposal to inset Send Business Park from the Green Belt because:

• With the new Marina planned on the Wey navigation, removal of this area will facilitate the total erosion of the greenbelt in this area through the infill of further buildings in the future.
• It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
• There is highly restricted vehicular access along Tannery Lane in both directions as well as limited access to the already busy Send Road.
• Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/699  Respondent: 11028737 / Sue Kershaw  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The housing numbers proposed are for nearly 14,000 homes over 15 years from 2016 to 2031. This number is too high. The model used to calculate the number has not been seen or the assumptions tested by the council or any of its officers. It has been, on numerous occasions shown to be flawed by various 3rd parties. This housing target will result in the borough's permanent resident population increasing at 4.5 times the rate of population increase during the period 2001 to 2011. This population growth, by definition, is excessive and unsustainable for a gap town with many environmental, physical and infrastructure constraints.

Over 70% of the proposed housing is planned for land currently in the Green Belt. Housing need is not a reason in law for protected green belt land being used. It is perverse for so much housing to be planned for the green belt. Clearly, the green belt has not been used as a constraint as clearly set out in Government advice, planning policy guidance, the NPPF, case law, election manifestos and Ministerial letters to MPs.

For the West Horsley this is reflected in a 35% increase in the number of houses within 3-5 years of a plan being adopted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2148  Respondent: 11028737 / Sue Kershaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the expansion of commercial land in the urban area losing the potential for further housing. Policy E7: Guildford Town Centre

There is no reliable evidence provided that the retail core of the Town Centre can support expansion of 45,000 sq m of additional retail space at North Street.

Online retail is set to account for 21.5% of total retail sales by 2018 from 12.7% in 2013, the highest online retail share in the world according to the Centre for Retail Research. March 2016, on line sales rose 12.3%, and it was the third consecutive month in which more than 20% of all non-food shopping took place online, (British Retail Consortium and accounting firm KPMG) With such a high retailers will need just 70 high street stores to create a national presence compared to 250 in the mid 2000's. An expansion on such a scale is negligent when the Council claims to be in such desperate need for housing.

Retail is a declining industry and should not be invested in by the Borough at the expense of housing in the most sustainable urban location, near employment and transport hubs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/2145  Respondent: 11028737 / Sue Kershaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy 11)

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages. There is too much traffic in our villages already and this plan will cause more congestion in West Horsley, East Horsley, Normandy, Ockham, Ripley, Send and Clandon, with no plan to improve that. The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses in such a small area means dangerous and unsustainable traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2147  Respondent: 11028737 / Sue Kershaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy 12)

The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Under the current economic climate post Brexit, it is unlikely any additional funding will be made available for new capital

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to poor air quality concerns (Policy 13)

The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health. It has been shown that Wisley already has NOX levels above the EU legal limits and by law a school cannot be located in this area as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

2. I object to not protecting the Green Belt (Policy P2)

Our Green Belt is precious. It is what protects London from urban sprawl; it preserves air quality; it prevents flooding; it is the city's playground. It is for us to conserve and protect it. There are 5 legal purposes for Green Belt, and it meets them all:

• To check the unrestricted sprawl of large built up areas
• To prevent neighbouring towns merging into one another
• To assist in safeguarding the countryside from encroachment
• To preserve the setting and special character of historic towns

To assist in urban regeneration by encouraging the recycling of derelict and other urban land. This policy is flawed and should have been amended. In the last consultation just six individuals, out of the c. 7,000 of those who took part in the consultation, supported the policy. Another 20 comments of support were from organisations such as: the University of Surrey, local councils (including Guildford), consultants (e.g. Savills) or landowners. But of the 1,371 who commented on the green belt policy 1,332 (97%) were against.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8. NO EXCEPTIONAL CIRCUMSTANCES

The local plan proposes nearly 9000 new homes to be built on Green Belt land (compared with ~ 50,000 current homes in Guildford, so approx. equal to 18% of the existing homes in the borough) - a huge proportion. The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. Unmet housing need is NOT an exceptional circumstance in law. No exceptional circumstances have been disclosed. So the Green Belt boundaries should NOT be changed through the plan making process.

9. BROWNFIELD AVAILABLE

There is brownfield land available in the town centre which is being earmarked for commercial development rather than for housing. This is enough to meet our real needs for affordable local homes. There are enough vacant commercial sites to cope with genuine business need, and we've enough retail capacity already, so urban brownfield/derelict land should be used for housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2150  Respondent: 11028737 / Sue Kershaw  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

10. DRAINS, WATER SUPPLY, FLOOD RISK, CONGESTION

Our drains, our water supply, our medical facilities and our roads cannot cope with the proposed number of new homes. Building this number of homes will lead to flood risk here and downstream (along the Wey and Thames). The planned development on Green Belt is therefore unsustainable.

In conclusion, I must ask you to revise the housing number, and to amend the Local Plan to utilise brownfield land rather than green field sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2143  Respondent: 11028737 / Sue Kershaw  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I wish to register objections to the Local Plan on a number of counts.

1. I object to the Local Plan as the development proposed is not sustainable (Policy 51)

13,860 new houses proposed is not sustainable - it will damage local communities by over development, especially West Horsley, East Horsley, Normandy, Ockham, Ripley, Send and Clandon. The local communities don't need these houses. Wisley Airfield (A35) and Garlick's Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car.

The development should be in urban areas where there is sustainable transport. West Horsley for example will see the number of housing increased by 35% within 3-5 years of the plan being adopted. The number and density of housing is not in keeping with the local area and is therefore against policies within the NPPF.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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In view of the continuing proposal for a huge programme of house building under the Local Plan, I wish to protest for the following reasons:

1. Details

As far as I can ascertain, no new Assessment of Need has been published, so those wishing to object must do so without full information. This is unsatisfactory and unjust.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6. Wisley

The proposal to build over 2,000 houses on the Wisley Airfield is most alarming:
• it almost equals the total number of dwelling in the villages of East and West Horsley combined, and dwarfs the neighbouring villages of Ockham and Wisley. It would change the nature of this area irrevocably, and not for the better!
• It would take many years for such a huge and sudden increase in population to be integrated into the Horsleys, Ockham and Wisley.
• It would put unsustainable pressure on the existing roads, schools and medical services.

The development needs to include a doctors' surgery; children's play facilities; secondary, as well as primary school spaces; and a railway station.

I do not object to appropriate housing development on the proposed brown-field sites, such as those opposite Bell and Colvill [West Horsley] and the BT land opposite Bishopsmead Parade [East Horsley].

The land abutting Great Ridings Wood in Norrels Drive, East Horsley is valuable in protecting the Woodland Trust land from being encroached upon, and vehicular access along Norrels Drive is restricted.

I therefore appeal to the Council

• to reconsider the plan;
• to reduce the number of homes proposed,
• to protect our green field sites, and to amend the Plan in favour of brown-field or re-development sites

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
5. Infrastructure

The existing infrastructure, particularly roads, water and drainage, are already under considerable strain. Roads and homes are increasingly subject to flooding.

The M25 junction with the A3, and surrounding roads are known traffic black spots and high pollution areas. These systems cannot sustain the impact of such a large increase in population - indeed it could be catastrophic

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1571  Respondent: 11028801 / Sandy Conway  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2 Green Belt

It is absolutely wrong in my opinion to encroach on London's irreplaceable 'Green belt'. Apart from its amenity value, it plays an incalculable role in maintaining the environment, particularly good air quality and water management. Furthermore, it is not we, but future generations who will bear the burden of its abandonment to the developers, namely:

• the inevitable 'urban sprawl'
• the loss of the County's historic character
• the degradation of villages and smaller towns.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1573  Respondent: 11028801 / Sandy Conway  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
4 Alternative sites

There are 'brown field' areas in Guildford, on which commercial development is planned; yet there are numbers of vacant commercial and retail sites. Why not reallocated them to housing?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1572  Respondent: 11028801 / Sandy Conway  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3 Size of increase

The huge number of houses proposed is wildly disproportionate in relation to:
• the existing size of Guildford
• its housing stock
• its transport systems
• its overcrowded schools

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/4221  Respondent: 11028929 / Christopher Webb  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the Guildford Plan.

On the grounds that despite repeated request from various bodies there has been a total lack of transparency over how the number of required houses has been derived. This is now further compounded by Brexit, as a significant portion of the housing requirement evolved around migration to the Guildford area which with Brexit is now a flawed assumption.
In addition no account has been taken as to the infrastructure requirement to satisfy a growth in housing, Guildford is already grid locked for a significant proportion of the working day. In addition to which services such as water and sewage are already stretched to capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17253  Respondent: 11028929 / Christopher Webb  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Green Belt should not be built upon its the very reason that people want to live in or around Guildford as not only does in provide AONB but it provides for the separation between town and village thereby giving Guildford the identity that it has. Remove that and its just another clone town with all the innate problems that this brings. Loose the identity and you will erode the desire to live in Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17254  Respondent: 11028929 / Christopher Webb  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan talks about the need for retail development, when this is clearly a reducing need. The plan needs to focus on urban building as opposed to retail allowing the "lungs" of Guildford to remain.

Has their been any analysis from a pollution perspective?, answer no.

This must be undertaken to understand the implications on our health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1922  Respondent: 11028929 / Christopher Webb  Agent: 

Page 414 of 2855
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

GBC is there to serve the needs of its people and was duly elected to do so, so why does it constantly fail to listen to the public its designed to serve.

In summary the Plan remains flawed and needs significant development and should therefor be rejected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4685  Respondent: 11029377 / Peter Turner Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have lived on the Hog's Back since 1936 in three different properties. My father used to farm Blackwell Farm and other local farms. I strongly object to the proposals for the development of Blackwell Farm, the construction of houses and the attendant creation of major road junctions, widening of the bridge over the A3, alterations to the alignment of the A31. Not only will all this create complete traffic chaos in the area but will also destroy an existing area of Green Belt and AONB.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/229  Respondent: 11029409 / John Lay Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the Guildford Local Plan for the following reasons:

9.) The proposed Infrastructure Schedule (Appendix C)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/230  Respondent: 11029409 / John Lay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8.) The figure of 693 houses per annum in the Borough being too high. (Appendix D)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1407  Respondent: 11029409 / John Lay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1408  Respondent: 11029409 / John Lay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2537  Respondent: 11029409 / John Lay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2538  Respondent: 11029409 / John Lay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC's Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/337  Respondent: 11029409 / John Lay  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5.) The inclusion of land at Garlick’s Arch, Send Marsh / Burnt Common and Ripley ( Policy A43 )

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/708  Respondent: 11029409 / John Lay  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7.) The damage caused to the historic environment as a result of the scale of the proposed development ( Policy D3 )

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/5631  Respondent: 11029409 / John Lay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the threat the Local Plan poses to the historic rural village of Ockham and the bUght on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/716  Respondent: 11029409 / John Lay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

11.) The employment strategy and the impact at Garlick’s Arch. ( A43 ) ( Policies E2 and E5 )

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/705  Respondent: 11029409 / John Lay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
3.) Due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/710  Respondent: 11029409 / John Lay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

12.) The lack of proper infrastructure planning for sites (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/712  Respondent: 11029409 / John Lay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

14.) Parking issues in local villages caused by a larger population.
15.) Local healthcare facilities becoming overwhelmed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5632  Respondent: 11029409 / John Lay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
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<td>13.) Due to the congestion that development will cause to the trunk Roads, A3 / M25 (Policy I2)</td>
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<th>PSLPP16/5634</th>
<th>Respondent:</th>
<th>11029409 / John Lay</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4</td>
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<td>13.) Due to the congestion that development will cause to the trunk Roads, A3 / M25 (Policy I2)</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/704  Respondent: 11029409 / John Lay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2.) There is no protection of the Green Belt (Policy P2)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5629  Respondent: 11029409 / John Lay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:
I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/706  Respondent: 11029409 / John Lay  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4.) Development in areas which are at risk of flooding ( Policy P4 )

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5633  Respondent: 11029409 / John Lay  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin (Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI)).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/702  Respondent: 11029409 / John Lay  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.) The Local Plan as shown in the development proposed is not sustainable (Policy S1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/707</th>
<th>Respondent: 11029409 / John Lay</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Guildford Local Plan for the following reasons:

6.) The Borough Wide Strategy (Policy S2)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/709</th>
<th>Respondent: 11029409 / John Lay</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Guildford Local Plan for the following reasons:

... 

10.) The poor air quality pollution concerns (Policy I3)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

The plan to build 2,000 homes on the old Wisley Airfield is also, in our opinion far too large to be sustainable & should be greatly reduced.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Re; GBC Draft Local Plan 2016

We wish to add our support to the East Horsley Parish Council letter dated 13.06.2016 which identifies the areas of concern within your proposals.

We do not intend to repeat the points as listed, but do want to record our particular concern regarding the extent of the proposed development in and around the villages of East & West Horsley.

The local facilities serving our villages are insufficient now, without adding to the situation with more housing.

We appreciate development is necessary, but the proposed level appears to be excessive, given the size of the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4229  Respondent: 11029441 / David Tagg  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We had always assumed that it was the policy of GBC to "protect the Green Belt".

Given the current proposals, this does not appear to be the case!

We want our children & grandchildren to be able to enjoy the green open spaces we enjoyed as children & that we still enjoy now.

Do you want your legacy as our elected representatives to be "the Council who destroyed the character of East & West Horsley"?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPP16/4230</th>
<th>Respondent: 11029441 / David Tagg</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In conclusion, we object to the reduction of the Green Belt in general & the proposed excessive level of new housing in & around East & West Horsley.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: pslp171/2253</th>
<th>Respondent: 11029441 / David Tagg</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I see from the revised "Local Plan (2015-2034) that the settlement boundaries of the Horsleys are still to be extended & removed from the "Green Belt". This is an absolute disgrace, the "Green Belt" is supposed to be the "Lungs of London"....with more vehicles & more pollution we need the Green Belt more than ever. Doesn't this Council listen to the people it's suppose to represent? It also appears to support the development of the former Wisley Airfield adding an additional 2000 houses to the area & causing more pollution... Do you want to remembered as the Councillors who destroyed "Our Green & Pleasant Land" FOREVER! You won't be able to reverse it the future.......**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<tr>
<th>Comment ID: pslp172/5029</th>
<th>Respondent: 11029473 / Mairi O'Connell</th>
<th>Agent:</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2677  Respondent: 11031713 / Stephen Barter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to register by objection to the following aspects of the GBC Local Plan. In general my concern is that the plan threatens to destroy the identity of both Send and Ripley villages, part of the development will be on Green Belt land and it will make the already highly congested roads in the area even worse.

Specifically I object to the following:

1. The number of homes (693pa) that the Plan intends to deliver.
2. The enclosure of protected Green Belt land within the proposed village boundaries (for which there will be a presumption for development in the future).
3. The Garlick’s Arch (Policy A43) proposal to build 400 houses and 7,000sq metres of light/general industrial/storage distribution space on the Green Belt.
4. The creation of new north and southbound slip roads to and from the A3 to the A247 Clandon Road (policy A43A) at Burnt Common.
5. The wholesale destruction of the Green Belt in this area (including the planned development of 2,000 homes at Gosden Hill Farm, Merrow – Policy A25) in clear contravention of the central government’s stated commitment for Green Belt protection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3585  Respondent: 11031713 / Stephen Barter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A42 change at Clockburn in Tannery Lane because not only does the increase in houses from 45 to 60 ignore all the previous objections to the development, but the increase on houses of over 30% will make access and traffic problems in Tannery Lane and the A247 junction even worse. It also increases the erosion of Green Belt in our village and will make surface water flooding even worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3586  Respondent: 11031713 / Stephen Barter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43 change at Garlick’s Arch because once again it aignores the huge number of previous objections made by local people. It will effectively join up the villages of Ripley and Send and defeat the key purpose of Green Belt. Also, there is no proven demand for Travelling Showpeople plots in this location; it will generate further traffic on the already congested roads of Ripley and Send; and it worsens the already considerable risk of flooding in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3588  Respondent: 11031713 / Stephen Barter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy A 58 at Burnt Common because it was deleted from the 2014 draft due to all the objections made previously. Furthermore, the word “minimum” referring to the 7000sq m of industrial and warehousing is a change from the previous “maximum” in the 2016 plan despite the fact that since that plan there has been a decline in the demand for industrial land. Also, with empty sites and units at Slyfield and Guildford, what reason can there be to put another development in the middle of Green Belt? Once again, such a development will further exacerbate the traffic congestion problems in the Ripley and Send areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the “historic location of Ash Green”, is inadequate and would need rewording to prevent this increased potential for coalescence.

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”

• Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

“Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

• Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

• Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.

1. The Street in Tongham
2. A331/A323 intersection
3. A31/White Lane junction

• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”

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“Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

Attached documents:

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<th>Comment ID: pslp171/2207</th>
<th>Respondent: 11031809 / Jackie Scott</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road

- **4.3.29 Amend to:** “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”

- **4.3.30 Amend to:** “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

- **Policy P3 Amend to:** (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

4.3.29 Amend to: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”

4.3.30 Amend to: “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

Policy P3 Amend to: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

Attached documents:
I am writing to object to the 2016 Draft Local Plan, mainly because of the disproportionate impact some of these proposals will have on the residents of Burpham.

The proposed development at Gosden Hill Farm will generate a lot of additional traffic through Burpham and the proposed new 4 way junction at Burnt common will not alleviate Burpham’s traffic problems as has been claimed. There is no provision for specific infrastructure improvements to either the A3 or local roads, where there is already an acknowledged deficit. The “Highways England” review of the A3 should be completed first. As everyone seems to agree that a “tunnel” would be a good idea, the proposed route of this should be taken into account before any houses are built at Gosden Hill.

The plan, if put into practice will merge all the villages along the A3 from the Hog’s back to the M25. This will result in a significant loss of Green Belt land and generate even more traffic in Burpham (and the A3/M25 junction) which already suffer from severe delays at peak times.

Has any thought been given to the existing water/drain infrastructure, which is in a precarious state? If Gosden Hill goes ahead, where will waste and foul water go, as the present sewage system cannot cope now? The proposed new housing site allocations at Wisley, Slyfield, The Horsleys, Gosden Hill, Garlick’s Arch and Send will generate 6,000 homes, over 40% of the total number proposed. As these are all within a few miles of Burpham, this is disproportionate and unacceptable to the residents of Burpham.

There is a lack of evidence for the alleged housing need numbers – 693 a year, more than double the previous figure of 322. Also, in light or the recent “Brexit” vote I think this definitely needs to be looked at again.

I also think that the local plan consultation period has been

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the 2016 Draft Local Plan by Guildford Borough Council (GBC) for the following reasons:

1. **Not protecting the Green Belt**

I object to the proposal to remove (“in-set”) Ripley, Send and Clandon from the Green Belt. Erosion of the Green Belt is wholly contrary to the Government’s manifesto policy and to the Council’s planning policy. The 2015 Government’s manifesto included a commitment to "prioritise brownfield development” and to protect greenfield land around towns and cities. The manifesto commitment stated that “We will ensure that local people have more control over planning and protect the Green Belt. We will encourage more neighbourhood planning and protect the Green Belt. Neighbourhood planning gives more power to local people, allowing them to play a much stronger role in shaping their areas”. The policy commitment to protect the Green Belt should be upheld. Not to do so would be a betrayal of the commitments made by the Government and to democracy.

The Green Belt must be protected against the many forms of development, otherwise more farmland and woods will be consumed by urban sprawl, especially around large cities. With the increasing global pressures from climate change and population growth, our farmland and woodlands will become more valuable in future, not less. GBC’s proposal for more
development in the Green Belt assume that this land is only valuable if built on, an assumption that is fundamentally flawed. The Green Belt is needed now more than ever.

1. **Disproportionate size of sites in relation to rural locations**

I object to the allocation of land to the strategic sites of Garlicks Arch (Ripley/Send border), Gosden Hill (Clandon) and Wisley Airfield. The proposed development of these sites will have a disproportionate impact on the surrounding local villages. They will have a permanent and negative impact on each of these communities.

1. **Unbalanced allocation of development in one area of the Borough**

Between the M25 and Burpham, a distance of only about 5 miles it is proposed that over 6,500 houses are built. This represents over 40% of the housing proposed in the Local Plan. I object to this area being hit so hard by the allocation of development, which is disproportionate to the rest of the Borough.

1. **Gerrymandering**

The concentration of Green Belt development is not only disproportionate to the rest of the Borough but has been disproportionately applied to Wards that are not lead by a Conservative borough councilor. For example, the Ward of Lovelace (Liberal Democrat) accounts for 15% of the Borough’s population but has been allocated 35% of the proposed house building. The Ward of Send (Guildford Greenbelt Group) has also been given a disproportionate amount of house building. The coincidence of this is statistically significant and demonstrates at best a form of punishment to Wards who did not elect a Conservative borough councilor and at worst a form of gerrymandering.

1. **I Object to the site A45 The Talbot**

This is an unreasonable overdevelopment in a conservation area. Ripley has already been impacted by at least 7 new housing developments in the past 3 years, without any improvements in roads, bus services, schools are medical centres.

1. **I Object to the site A57 The Paddocks**

Site A57 was part of planning application 14/P/00867 in May 2014 which itself was a blatant re-hash of planning application 09/P/01554. The caravan site had already been established at the time of the application, suggesting that a retroactive application was being sought. The unauthorised development of the site runs wholly contrary to the Council’s planning policies. The Council should attach high priority to its planning enforcement role and should not stand idly by where there are flagrant breaches of planning rules, particularly on a prominent site like this in a Green Belt / Conservation area.

Planning application 09/P/01554 was refused permission by GBC, and the appeal was rejected by the High Court in April 2013. Although the site’s continued occupation has been judged completely illegal, no enforcement action has yet been taken by GBC. GBC should take immediate action on the enforcement notices against illegal occupation. The Council is accountable for protecting the interests of the community and should not run away from its responsibilities.

1. **I Object to the site A43 Garlick’s Arch**
Garlick’s Arch is a 100 acre site of Green Belt and ancient woodland which should be protected.

1. **Congestion on the A3 and M25 trunk roads**

I object to the development of the strategic sites due to the A3 and M25 already being at capacity during peak hours. Highways England has no plans to look at improving the A3 before 2020. It is therefore not sustainable to identify sites for further development which will worsen the congestion on these motorways and trunk roads.

1. **Congestion on the local village roads and lanes**

Our villages are already suffering from severe congestion for much of the day. For example the Newark Lane and Rose Lane junction in the center of Ripley, which at peak hours, is regularly gridlocked due to the volume of traffic, made worse when Ripley High Street (B2215) is used as a detour/slip road when the A3 is jammed. I object to further development which will cause even greater congestion in and around our villages.

1. **Unsuitability of our local roads for heavy vehicles and more traffic**

Many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. For example, part of Newark Lane which was resurfaced for the 2014 Olympics cycle route and has been used subsequently for other cycling events, has had to have regular “fixes” to crumbling road surfaces and recurring potholes due to traffic volumes far in excess of the road surface quality used. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

1. **Poor air quality concerns**

Further congestion, particularly in built up residential areas will only lead to greater levels of air pollution. I object to further development, which will result a fall in the air quality.

1. **Lack of proper infrastructure planning for sites**

I object to the lack of planning and implementation of infrastructure. For example at Garlick’s Arch. Without improvements to the infrastructure prior to development, the existing residents’ quality of life will significantly deteriorate in many ways. Local services such as medical centers and schools, which are already overstretched, will not cope.

1. **Sites being planned in unsustainable locations**

Many of the strategic sites e.g. Wisley Airfield and Garlick’s Arch, are in unsustainable locations. They do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. I object on the grounds that these sites are not sustainable.

1. **Parking issues in local villages caused by larger population**
Many of the affected villages, such as Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems, to which I object.

1. **Local healthcare facilities will be overwhelmed**

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. I object to the further stress it will put upon existing overstretched health services.

1. **Local schooling facilities will be overwhelmed**

Without proper planning and a commitment to fund new schooling, existing schools will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. I object to the further stress it will put upon existing overstretched schools.

1. **No protection of the environment and heritage assets**

I object to the lack of protection of the environment and heritage assets.

1. **I object to the lack of any evidence for the alleged housing need numbers**

Nowhere in the Plan document can I find an explanation for why new houses need to be built other than the obvious that there are too many people. But this is addressing the problem in the wrong way. The problem of overpopulation is due primarily to the massive influx of immigrants. Successive Governments have failed either to listen or act on public opinion on immigration into the UK. Some in the last government have at last acknowledged that they failed spectacularly to control the numbers of people entering the UK from Eastern Europe and elsewhere resulting in serious problems of overcapacity. It is sheer madness and foolishness to try and resolve the problem of overpopulation by creating even more problems building more houses and destroying the green belt to achieve this.

GBC should not punish local residents for the errors of central government. Its residents will applaud GBC for standing up to central government and the constituents will have the confidence to re-elect GBC in the future if they properly support their constituents.

1. **I object to the limited consultation period**

The Council, having sneaked this proposal in at the last minute without any consultation whatsoever with the community, has only allotted six weeks to register objections to a document over 1,800 pages, this is half the usual time. The document is far too long and complex for most people to understand, and as such I consider it more than as a PR exercise and not fit for purpose.

Lord (Paul) Bew, the crossbench peer who chairs the Committee on Standards in Public Life, stated that public office holders must be seen "to be demonstrating the seven principle of public life - selflessness, accountability, objectivity, integrity, honesty and leadership". I hope that GBC will listen to all the comments by the community they serve, including the local parish councils and local councilors and demonstrate that they are truly serving their community with these principles and protect the green belt.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>11031937 / Patrick Ollington</th>
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The increase in housing numbers from 45 to 60 at Site A42 in Tannery Lane will have a significant impact on the already highly congested local rural road network around and within Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to the 2017 Revised Local Plan by Guildford Borough Council (GBC) for the following reasons:

Housing at Site A43 Garlicks Arch would be on Greenbelt Land.

The potential increase from 400 houses at site A43 Garlicks Arch is extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages.

The inclusion of 6 Travelling Showpeople plots with associated storage facilities is entirely inappropriate in a rural environment within the Greenbelt and there is no identified need within the Local Plan documentation.

The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan and so is out of scale with the proposed development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Comment ID: pslp172/689  Respondent: 11031937 / Patrick Ollington  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

The potential for a substantial increase in industrial floorspace from 7,000 sqm to an unspecified amount at the site A58 Burnt Common does not provide local residents with enough information for a full and proper consultation given the ambiguity and lack of detail within the document.

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, tucked away in policy 4.4.23a and does not allow for full and proper consultation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: PSLPS16/6976  Respondent: 11032097 / Sue King  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

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Page 438 of 2855
• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
• I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
• I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.
• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposals for Wisley airfield falls exactly into this category...GBC are trying to justify the development under unfulfilled housing need (which has been exaggerated at best) and in any case unfulfilled housing need is not sufficient argument to build on green belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3855  Respondent: 11032129 / Claire Sinclair  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do support the designation of Bishopsmead Parade, East Horsley, as a rural Local Centre under the draft Local Plan and the designation of Station Parade, East Horsley, as a District Centre under the draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3851  Respondent: 11032129 / Claire Sinclair  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The affordable homes policy is laudable but GBC are planning on building them in the area of least demand where transport links are not good and there are limited jobs. In fact the demand in the village is for affordable three bed homes, contrary to what BC have outlined. The plans fail the test of sustainability on many counts, including this one.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposal not to grant Effingham junction PTI status is baffling since the very arguments used to further Horsley stations claim are used against Effingham Junction. EJ plans just as an important role and is far more accessible than Horsley and should have PTI status.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I am writing to express my total dissatisfaction with the proposed local plan. On many fronts it is in breach of regulations and facts have been misrepresented by GBC.

Here are my main objections. I am not able to express them in legal terms but these are the feelings of 90% or greater of the two villages of East and West Horsley. The Surrey Hills AONB is one of the great treasures of Guildford Borough and I strongly believe that protecting this area should be given the highest priority.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The opening statement of Policy P2 that “We will continue to protect the Metropolitan Green Belt” is blatantly disregarded all the way through this local plan. GBC appears to be in breach of this policy through the housing policies it has set out in the Proposed Submission Local Plan, whereby some 65% of developments will be made on land that is currently Green Belt. It is not a Government directive to build on greenbelt land as GBC present it and would have us believe. In fact Government guidelines say that greenbelt land should only be built on in. The local plan does not make nearly enough argument for ANY of the proposed greenbelt land developments to be considered ‘exceptional circumstances’. You have a duty to protect the greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3853  Respondent: 11032129 / Claire Sinclair  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The schools are oversubscribed and full, particularly the Raleigh, (including the Howard, the only viable option for local secondary schooling in the state sector). There are no plans to increase secondary school provision! Where are all the children from the new houses going to attend school? All the other services are stretched to the max including doctors surgeries, dentist (only one NHS) in the two villages!!!, not to mention the busy east Horsley station parade.

Drainage is already an increasing problem and each year the flooding gets worse in certain areas..some of which are right by the proposed developments. The developments would only exacerbate this situation. II

[The proposed boundary changes would devastate the only open green communal area in East Horsley, Kingston meadows and other boundary changes are ridiculous in that they ignore natural boundaries which exist and are currently used (such as a deep drainage ditch) and would seek to move these to further the machinations of the developers. The arguments for the boundary changes are therefore invalid.

By changing the boundary to include area past the A246..and infilling in the spaces, you are threatening the green belt in the same way as new developments and I view this with the same scepticism and unless the boundary changes can be lawfully justified, they are invalid too.

Green Belt rules make it clear that unfulfilled housing need is not normally considered to be ‘an exceptional circumstance’. If it were the entire Green Belt would already be covered in tarmac. Also, every movement in settlement boundaries must be justified by ‘exceptional circumstances. Therefore most of these proposals should be thrown out because they could only be considered under exceptional circumstances and these do not exist and the proposals cannot be justified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
In all, the draft plan is flawed in the extreme and GBC’s insistence on forcing developments where there is no proven need and riding roughshod over laws put in place to protect our valuable green spaces must be prevented at all costs. This plan must be rejected apart from the areas which I have identified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

West Horsley is being considered as two separate plots and therefore the allocation of housing is increased due to this. I feel baffled as to why West Horsley is split into North and South since it has only one small section of shops near Bell and Colville. The village should be considered as one entity. When viewed as such, it is clear that the proposed density of housing is an extraordinarily high percentage, once again far outstripping identified need, none of which warrants building on green belt land, or reclassifying green belt land because there are no exceptional circumstances.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

The need for housing projected over the next few years is far lower than GBC are supposedly making provision for. What you are prosing in effect a 35% increase in housing in two small villages which barely have the facilities and infrastructure to cope with the population as it stands. This is unprecedented and far beyond anything proposed elsewhere in the borough. It is completely unreasonable especially since predicted growth in the area is much nearer 15%.

GBC has voluntarily chosen to pursue a policy of aggressive civic and economic expansion which underpins all of the housing policies in the Local Plan. GBC’s target of a 25% increase in housing stock is entirely down to a political choice made by GBC and well in excess of the official statisticians’ forecasts. Why are GBC pursuing this aggressive house building project when there is no proof of demand?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1906  Respondent: 11032225 / Graeme Markwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to express my opposition to the Guildford Local Plan for the following reasons:

- The character off the area will be adversely impacted through noise and pollution
- There are not enough essential amenities available for such a population influx, in particular the availability of accessible school places would be impacted
- The Green Belt Boundaries were created to protect the characteristics of this area of outstanding natural beauty and moving them is immoral
- Local wildlife will be adversely affected
- The roads and streets will become much more hazardous places as many use them inappropriately, contravening the speed limit.
- The increased volume of traffic will lead to more road traffic accidents and the potential of children being killed road traffic accidents are the most significant cause of unintentional injury for young people.
- Healthcare services will be adversely affected by increased numbers it is already very challenging to secure an appointment with a GP

It is my sincere belief that the plans as they stand will reduce the quality of life of residents currently living in and around the Horsley's.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I wish to comment on this local plan in respect of West Horsley.

I wrote to you on 21st September 2014 but regretfully never received any response from you so I am repeating much of what I wrote then.

As I do not know where precisely where Cranmore Lane turns into Little Cranmore Lane I shall just refer to both as Cranmore Lane in the following.

I should be grateful if you would consider an additional alternative development site on land to the east of Overbrook and west of Cranmore Lane. I have spoken to the owner of adjacent Barcombe Farm who would be happy to include his fields between Barcombe Farmhouse and Cranmore Lane within a development area. These areas are shown on the attached plan being land parcels Nos 154 and 136 totalling some 6.769 acres. These should have been identified for possible development in your original study.

This site has the benefit of being in the centre of the village (ie West Horsley South) and would round off the village settlement boundary by the recognisable and defensible boundary of Cranmore Lane.

The land involved is very poor quality agricultural land and not being part of a larger holding is uneconomic to farm, and is completely surrounded by other residential housing.

Whilst your study states that this parcel of land has limited access at present a new access to this site would have to be negotiated but there are several possibilities including the demolition of one or two existing houses to make way for such access. An access up the driveway to Barcombe Farm from The Street is also perfectly possible.

This site would NOT be a visual intrusion on the village as it is tucked away behind the Overbrook estate and Fulkes Cottages and bounded by woodland to the East and the South, and cannot be seen from higher ground or other roads.

I am confident that the selection of this site would find more favour within the village than those proposed given that some more development in the village is said to be necessary. Furthermore it could be at a density more appropriate to the village situation rather than the extremely high densities proposed.

Regarding the remainder of the plan I would like to see in it proposals to deal with future medical facilities which are at present overstretched, Increased parking at Horsley Rail Station which is at present full on most weekdays, increased capacity of local schools in order to deal with the proposed increase in population.

I view the plan as being produced at a very high level with less than sufficient consideration to the actualities that exist in a lot of the various locations in the Borough.

I hope I will receive a response from you this time and would be happy to enter into further discussions regarding the inclusion of this suggested site into the final Borough Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**  Pages from Scan 161990002.pdf (577 KB)
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<td>I object to building 45 houses at Clockbarn nursery. There is inadequate access to this site with Tannery Lane being too narrow and twisty to take any more traffic. The Junction at Send Road is already hazardous and with planning permission already granted for housing and a marina, traffic along this road is already set to increase.</td>
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<td>I object to building 400 houses and 7000sq metres of industrial space at Garlick’s Arch. The site is prone to flooding and is covered by ancient Woodland. The industrial space is not required, or should be incorporated within existing industrial sites at Slyfield. Proper use of Brownfield sites should also be used to prevent this incursion into the Green Belt. Guildford’s housing requirement has shown to be exaggerated, therefore disputing the need for these houses.</td>
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I object to a new interchange with the A 3 at Burnt common. Traffic from the proposed 2000 houses at Wisley Airfield would then have to come through Send, along with traffic from all the other proposed sites in the surrounding area. Send Road is already overloaded and gridlocked during rush hour. Noise and pollution levels would reach excessive levels. Please can these comments be passed to the Planning Inspector for review and confirm that you have received this communication.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/5265  Respondent: 11032385 / Celia Guthrie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the development of 40 houses and 2 travellers pitches at Send Hill. The location is inappropriate because the only access is a narrow width single access country road. The road is too narrow to provide sufficient access to the site or accommodate increased levels of traffic. Send Hill already suffers from severe congestion, especially at school run time and would not cope with an increase in traffic volume. The development would spoil a high amenity area set in beautiful countryside and again erode the Green Belt. There would be significant impact on the nature reserve nearby.

The proposed development site A44 is registed by GBC as a landfill site not a quarry as listed as ref LLA 2081. As a landfill site it is not suitable for housing development for health reasons, any disturbance of the site would create a possible health hazard as material of the landfill is not known. Monitoring wells on site record methane gas discharge occurring.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10623  Respondent: 11032385 / Celia Guthrie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the Proposed Local Plan for a number of reasons listed below.

I object to Send Village being removed from the Green Belt. Councillors and central government gave an election promise to protect the Green Belt and this reneges on it. The Green Belt in Send helps Send to maintain its village identity and prevents Woking and Guildford merging into one big urban conurbation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the Proposed Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3

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Comment ID: PSLPS16/6891  Respondent: 11032417 / Amy King  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3
junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3233  Respondent: 11032513 / Mary Candy  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the lack of any immediate provision for Doctors’ surgeries.
2. I object to the lack of any immediate provision for new schools.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3232  Respondent: 11032513 / Mary Candy  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
<table>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of any evidence for all the alleged housing need numbers. Evidence Base

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/13321</th>
<th>Respondent: 11032513 / Mary Candy</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all erosion of the Green Belt.
I object to any “in-setting” (i.e. removal) of any villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate amount of development in one area of the Borough.
I wholeheartedly object to the proposals as a whole, due to the massively destructive impact it will have on the village of Ripley, and the neighbouring village of Send, as well as nearby areas such as Wisley, Clandon and Burpham. This impact would be felt not just with the implementation of these ill-thought-out plans, but for all future generations in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the limited consultation period.

I object to the last minute inclusion of new sites with less than two weeks’ notice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following reasons:
1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the

Attached documents:
Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,068+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCl).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
As a resident of Burnt Common, Send I object to the proposed developments at:

A42 Clockbarn Nursery, Tannery Lane
A43 Garlicks Arch

(And the outline planning application 16/P/00783. For 9 houses on the site of MG Garage/DAG Scaffolding.
Which if granted could be a Trojan horse access for the much larger development, Garlick’s Arch.)
A43a New Slip Roads to/from A3 at Send Marsh/Burnt Common
A44 Winds Ridge and Send Hill

I object on the grounds of building on ‘Green Belt’ land, which are the lungs of London. And are meant to prevent Urban spread in the countryside and the linking of settlements.

I see no exceptional circumstances to take Send and Ripley out of the Green Belt. Especially as Villages to the East of the A3 maintain this status.

The increase in traffic flow. Our roads already strain to cope with existing levels of traffic. Especially all the approach roads to the A3, and in particular the A247 to and from the Burnt Common roundabout. Which passes a school, a Doctors surgery and goes straight through the centre of Send.

The increased pressure on local facilities, Doctors, Schools etc. that 485+ homes would bring. Send does not need, nor do we want a 25% increase in population.

Warehousing and Industrial units are included in Policy A43. I question why was the Cassidy Slyfield Ltd. North Slyfield site, allocated in 2014 By Guildford Council for Industrial and Warehouse use, withdrawn from the Local Plan recently. Surely expanding an existing Brown field industrial area is better than creating a new one on Green Belt Land!

I see these developments solely as commercial gain for the developers and of no benefit to the existing residents of Send, Ripley and the surrounding area. In fact the level of development proposed will be detrimental to those of us living here.

Please take into account my objections when making your decision.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object Policy A42 Clockbarn Nursery. Tannery Lane. 45 Houses.

As Planning permission has already been granted for development of a marina and 64 apartments (Despite strong local objection) in this narrow lane. Further development will only increase traffic in this narrow lane to an already dangerous junction with the A247.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I object Policy A43 Garlick’s Arch. Send Marsh/Burnt Common/Ripley

To the building of 400 houses on this site, Because it was not include in the regulation 18 draft and has not been previously consulted upon.

It is on Green belt, permanently protected by NPPF to prevent the merging of settlements. There are no exceptional circumstances to take this site out of the Green Belt.

The site is covered in Ancient Woodlands, containing trees that have stood since the 16th Century, this area must be conserved for future generations.

I object Policy A43 cont… to the Warehousing and Industrial units which are included in the Policy.

Employment Lands Needs Assessment (ELNA) 2015 shows an 80% reduction from the previous ELNA carried out by GBC in 2013 for employment space.

If Industrial and Warehousing units are required, I question why the Cassidy Slyfield Ltd. North Slyfield site, allocated in 2014 By Guildford Council for Industrial and Warehouse use, was withdrawn from the Local Plan recently.

Surely expanding an existing Brown field industrial area is better than creating a new one on Green Belt Land!

Also heavy traffic would be attracted to Garlick’s Arch site from the M25 and A3, a lot of it also using the A247, which is not suited to this traffic!

I object because GBC’s Transport Assessment was not available to Councillors for the vote taken on 24th May for these proposals. It was published on 6th June! Infrastructure requirements must be assessed before major proposals are voted on.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object Policy A43a, the North facing slip road to from A3 at Send Marsh/Burnt Common

On the grounds of the increase in traffic flow. Our roads already strain to cope with existing levels of traffic. Especially all the approach roads to the A3, and in particular the A247 to and from the Burnt Common roundabout. Which passes a school, a Doctors surgery and goes straight through the centre of Send, linking Guildford and Woking. The A247 is 2 way road and not suitable for the high levels and heavy traffic this will create.

I object because GBC’s Transport Assessment was not available to Councillors for the vote taken on 24th May for these proposals. It was published on 6th June! Infrastructure requirements must be assessed before major proposals can be voted on.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID: PSLPS16/1987   Respondent: 11032705 / Mike Tarrant  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object Policy A44. Winds Ridge and Send Hill

I object to this development because it was not include in the regulation 18 draft and has not been previously consulted upon.

It is on Green belt, permanently protected by NPPF to prevent the merging of settlements. There are no exceptional circumstances for taking this site out of the Green Belt.

The site contains documented unsafe landfill waste which is currently vented.

The site is also in a single track lane which is unsuitable for larger vehicle access, which the two traveller pitches would require.

The Lane is also the site of the Cemetery, a peaceful place to reflect and remember those who have gone before us.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPP16/4233</th>
<th>Respondent: 11032705 / Mike Tarrant</th>
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<tr>
<td>I object because of the increased pressure on local facilities, Doctors, Schools etc. that 485+ homes would bring to Send. 485 new homes would generate circa half a class, the new amalgamated Send school has no capacity for these pupils. Send does not need, nor do we want a 25% increase in population.</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong></td>
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<tr>
<td>As a resident of Burnt Common, Send I object to the following proposed developments: I object Policy P2. In-setting of Send and Ripley. I object to taking Send and Ripley out of the Green Belt, I see no exceptional circumstances for this. Vulnerable land includes, School playing fields and land adjoining the Wey Navigation Canal, a National Trust facility. Also, Villages to the East of the A3 maintain Greenbelt status. I object to building on ‘Green Belt’ land, which are the lungs of London. And are meant to prevent Urban spread in the countryside and the linking of settlements. In this case Send, Ripley and on a broader scale to Woking and Guildford. Local and Central Government gave clear commitment that the green belt would be protected. These proposed development go against this.</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A25 Gosden Hill Farm, 2,000 houses, on Green Belt Land.
I object to Policy A35 Wisley Airfield, 2,000 houses in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4235  Respondent: 11032705 / Mike Tarrant  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate quantity of proposed development in the Send, Ripley, Wisley, Horsley, Clandon, Merrow Area of the Borough.
I see these developments solely as commercial gain for the developers and of no benefit to the existing residents of Send, Ripley and the surrounding area. In fact the level of development Proposed will be detrimental to those of us living here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/775  Respondent: 11032705 / Mike Tarrant  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object because GBC have exaggerated the need for the 13,860 house currently in the local plan. A population increase of 20,000 in the plan period would require just 8,000 homes based on 2.5 soles per habitat.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/774  Respondent: 11032705 / Mike Tarrant  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object because GBC have not followed correct process. Since 2014 GBC has made changes on every major proposed development in Send and have now added a major road junction. Policy A43a.

The 2014 proposal for 430 house in Send was reduced to 185 in April 2016. In May 2016 policy A43 was added with 400 houses and Industrial units. These significant changes require full consultation under Regulation 18. Regulation 19, which GBC are using is not appropriate in this instance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp173/52  Respondent: 11032705 / Mike Tarrant  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send Marsh/ Burnt Common

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to Policy A42: Clockbarn Nursery. Tannery Lane.

I object to Policy A43: Garlick’s Arch. Send Marsh/Burnt Common/Ripley.

Because, the 2014 proposal for 430 house in Send was reduced to 185 in April 2016. In May 2016 policy A43 was added with 400 houses and Industrial units. At June 2017 we have 500 houses and 10 Traveller/Show people plots.

I object to these latest changes because of the increased pressure on local facilities, Doctors, Schools etc. that 500+ homes would bring to Send.

500 new homes would generate circa half a class for Send school, which has no capacity for these extra pupils.
Send does not need, nor do we want a 25% increase in population.

I object because GBC have exaggerated the need for the 12,426 houses currently in the local plan. A population increase of 20,000 in the plan period would require just 8,000 homes based on 2.5 soles per habitat.

I object to Policy 2 paragraph 4.3.15 Send Business Park, Tannery Lane, removal from Green Belt

Because, these buildings are traditional non-conformers, adjacent to the National Trust owned Wey Navigation Canal/River. An area of outstanding countryside and natural habitat for birds and wild life. The night time Owl spotting is marvellous.

Further development will only increase traffic in this narrow lane, single track in parts, to an already dangerous junction with the A247.

I see these developments solely as commercial gain for the developers and of no benefit to the existing residents of Send, Ripley and the surrounding area. In fact the level of development Proposed will be detrimental to those of us living here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/439  Respondent: 11032705 / Mike Tarrant  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A42: Clockbarn Nursery. Tannery Lane.

Because, an increase of 15 houses, making 60 in total is over the top. Development is not required or wanted.

As Planning permission has already been granted for development of a marina and 64 apartments (Despite strong local objection) in this narrow lane, single track in parts. Further development will only increase traffic to an already dangerous junction with the A247.

Because, It will impact on the views from the River Wey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/440  Respondent: 11032705 / Mike Tarrant  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A43: Garlick’s Arch. Send Marsh/Burnt Common/Ripley.

Because, the addition of self-build and custom plots. Development is not required or wanted.

I object to the addition of 8 Travelling/Show people pitches. Because, the Local Plan H1 states that Traveller or Travelling Show people accommodation should be provided on developments of 500 homes or more. This development is for 400 homes, so does not meet the required criteria.

Because, this site is on Green belt, permanently protected by NPPF to prevent the merging of settlements ie Ripley/Send Marsh/Send. There are no exceptional circumstances to take this site out of the Green Belt.

The site is covered in Ancient Woodlands, containing trees that have stood since the 16th Century, this area must be conserved for future generations.

I object because, this site is subject to flooding and has a flood zone 2 allocation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/441  Respondent: 11032705 / Mike Tarrant  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object Policy A58: Burnt Common. Warehousing and Industrial units.

Because, of the change of wording from up to 7,000sq m. to minimum of 7,000sq m. The use of the word ‘minimum’ opens up the site for unlimited development. Which is not required. Employment Lands Needs Assessment (ELNA) 2015 shows an 80% reduction from the previous ELNA carried out by GBC in 2013 for employment space.

Because, heavy traffic would be attracted from the M25, A3 and the A247, which is not suitable for commercial traffic!

I object because Industrial and Warehousing sites and units are still empty at Slyfield and Guildford. So surely expanding existing Brown field industrial areas is better than creating a new one on Green Belt Land!

I question why the Cassidy Slyfield Ltd. North Slyfield site, allocated in 2014 By Guildford Council for Industrial and Warehouse use, was withdrawn from the Local Plan?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: pslp172/4433  Respondent: 11032801 / Louise Springfield  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4434  Respondent: 11032801 / Louise Springfield  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.
12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.
13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.
14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.
15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/544  Respondent: 11032801 / Louise Springfield  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3874  Respondent: 11033057 / Jo Komisarczuk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 I request a confirmation by email from GBC that all of the objections made below are put to the Inspector appointed by the Secretary of State to review the GBC Regulation 19 draft local plan.

1.2 I request that once my objections are fully taken into consideration the draft plan is amended accordingly and re-issued.

1.3 Guildford is a constrained borough with nearly 90 percent of its area zoned as permanent Green Belt plus it has an out of date road network that is already at or beyond capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPS16/7246  Respondent: 11033057 / Jo Komisarczuk  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35 |

I Object to the proposed sites at Wisley Airfield (A35) and Garlicks Arch (A43) are unsustainable locations they cannot be reached by public transport, train stations and bus routes, and will force all occupants of the proposed properties to be dependent on cars. As the local roads around these sites are lanes which are already at or above capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPS16/7247  Respondent: 11033057 / Jo Komisarczuk  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43 |

I Object to the proposed sites at Wisley Airfield (A35) and Garlicks Arch (A43) are unsustainable locations they cannot be reached by public transport, train stations and bus routes, and will force all occupants of the proposed properties to be dependent on cars. As the local roads around these sites are lanes which are already at or above capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I Object that the plan for Garlicks Arch (A43) was added in the late evening of the day of the Council executive meeting, just a week before the full council passed the draft local plan for public consultation.

I Object that there are no provisions for any infrastructure around Garlicks Arch (A43), there are already issues with getting existing children into primary and secondary education around these villages. The Drs requires at least a two week wait for an appointment, the mobile library no longer serves the local area and the lanes are constantly full of fast moving traffic. This is totally unsustainable.

I Object to the inclusion of the land for new on off ramps at Garlics Arch (A43a) This is just not sustainable nor has it been thought through. It will draw huge numbers of cars into the area which is already at traffic capacity, causing a huge detrimental effect to the villages in the area. Once the vehicles are heading to or from the site, they are immediately in local minor roads, which are not designed for the traffic load which will occur, even if none of the new housing and warehousing were built this plan would be unsustainable. With the new housing figures there will be huge extra numbers of cars trying to gain access, via West Clandon, where two lorries cannot pass at some point, through Burnt Common and Send where the traffic is residential all through the villages of Send and Old Woking, and the roundabout at Send, Old Woking, cannot possibly deal with such new traffic flows. This has not been thought through at all, it will bring the entire area from the M25 to the A3 and all the surrounding villages to complete Grid Lock, which will have huge impact to the health of those living in these areas.

I Object to the damage of the Historic Environment and woodland at Garlicks Arch (A43) building will double the building on the area and the ancient woodland including over 80 mature trees and associated plants and animals will be lost forever.

I Object to the proposed Infrastructure Schedule C, which takes no account of the proposed use of the land at Garlicks Arch and is therefore not fit for purpose.

I object to the lack of infrastructure planning for the sites Policy I1, which does not take account of Garlicks Arch at all, and for other sites it just appears to use existing infrastructure, when in these villages all services are at capacity currently.

I Object to the poor air quality which will inevitable result from such huge development in such a small area, this can only led to greater pollution not just for the construction of the homes but also for their use, and that of associated vehicles which can only harm the existing residents and also the health of the new residents too. The area is already polluted by the A3 and the M25, increasing the land use for housing to such an extent can only add to this already difficult situation for those living here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16242 Respondent: 11033057 / Jo Komisarczuk Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I Object to the inclusion of land at Garlicks Arch, Burnt Common, Send Marsh. This land is protected from development as Green Belt; the Government has stated that Housing cannot be a reason for losing Green Belt. Therefore there are no extenuating circumstances, for doing this on such a site, which is a mixture of farm land, and ancient Woodland and is a haven for local wildlife, from deer through to bats with all steps in between. I note that no wildlife plan has been included with this plan. The site floods, has no infrastructure and there are no plans for schools, Drs or other planning to support such a site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/16238</th>
<th>Respondent: 11033057 / Jo Komisarczuk</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the local plan to the number of houses required to be built because it is not sustainable, there is no road infrastructure to accommodate such huge numbers of homes and people, nor are there the schools, doctors, dentists and hospital places to sustain such a huge increase in population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the Policy E2 at Garlicks Arch (A43) 7,000 sq. m of warehousing and storage use Class B1c, B2 and B8) floor space will be directed to the Industrial Strategic Employment Sites. This could be put either at Slyfield or just to the South in Burnt Common where there is an existing brown field site which can easily accommodate the requirement, and was removed from the plan with less than two weeks notice. How can it be beneficial to take land out of production and lose ancient woodland and leave an existing brownfield site giving no benefit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that Guildford Borough Council members stood for the green belt and people voted them back in, now their true colours are shown, and they want to inset so much Green belt, while not giving consideration for brown field sites and population density in existing urban areas. Even The MP for Mole Valley says that this plan is not fit for purpose.

I Object to the huge impact on the local Trunk Roads A3 and M25, huge improvements need to be made to these routes prior to any housing being added to the area. The A3 to Guildford is a large car park at peak hours. The expected time for improvements to the A3 Guildford is 2020 at the very earliest and now we have Brexit to add to the thoughts of this plan, there is no way that the timetable for such infrastructures’ to be updated prior to this date. Therefore this is another reason the plan should not stand.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the offsetting of any of the greenbelt, Policy P2. Once it is gone it is gone for good, there is no route back. This is why the act was passed originally to protect the villages and green spaces of England, if this plan goes ahead, Guildford will be joined to everywhere from the hogs back to the M25. The entire length of the A3 will become a corridor of unwanted houses instead of the green fields which are currently present. This proposal to concrete over farmland which only developers can ever benefit from comes at a time when the UN predicts the loss of farmland to climate change is not acceptable. Also the plans for Garlicks Arch have been added with less than two weeks notice, but the existing brown field site just to the south of Burnt Common, which has been removed.

I object to develop to the building on land which is susceptible to flooding (Policy P4). The plan does not take notice of the National Planning Policy. Garlicks Arch is constantly flooding and is according to the Environment Agency to be at a higher risk of flooding than Guildford Borough Council’s estimate. This land floods regularly and the Councils estimate is not up to the standard required for this plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I Object to the loss of rural employment Policy E5, which supports the retention of local services and businesses within our rural communities. Garlicks Arch will result in the loss of four such small and local businesses, two of these have been in existence for over 30 years and the other two for about nine years. Therefore this plan does not support or promote rural employment; rather it is ending valued local businesses.</td>
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<td>A42 Clockbarn Nursery Tannery Lane, I object to this policy, Tannery Lane is yet another tiny lane which already has to deal with too much traffic, and with the addition of large vehicles it will erode quickly while also causing even more congestion through Send. The River Wey navigation will have the views impeded by the building of all these houses, and why has the number of properties suddenly increased by 33%. There is also surface flooding in the area, after all it is really flood plain, so where will all the water be diverted too?</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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<th>Comment ID: pslp172/3847  Respondent: 11033057 / Jo Komisarczuk  Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
I strongly object to: The plan A58, land at Burnt Common, London Road was I believe removed from the previous version of the plan, which they claimed at the time was why they could now add A43 Land at Garlick’s Arch. So why is it back, bigger and worse for anyone living in the area?

I strongly object to the use of Green Belt for anything as it is a way to stop villages merging and also being the lungs for London and our area. These were the stated purposes when the Green Belt was set up, so what exactly has changed?

I strongly object to A43 Garlick’s Arch, this new plan is against our wishes, with thousands of objections already made by local people. There is no infrastructure to support any such building, as these quiet country roads and lanes are already overloaded and often jammed, particularly during rush hour and at the school times. This is a beautiful, green permeant Green Belt area for which no exceptional circumstances have been given for removing it from the green belt, which are required by the National Planning Policy. The proposed development of this land will join the villages of Ripley, Send, West Clandon and the hamlet of Burnt Common into one large conurbation, which when included with other proposed plans within the local plan, will extend as far as Guildford Borough goes towards Leatherhead, including East Clandon and the Horsleys as well as Wisley and Ockham; basically into one large mass of housing. The number of homes required in A43 is totally excessive and unnecessary, and we can all be assured that these will not be homes for local young people but large four plus bedroom, mini mansions especially as the council has given the builders permission to pay their way out of building affordable homes in policy 4.2.23. The land at A43 Garlick’s Arch is frequently flooded, and is currently a flood zone 2 allocation, it is across Burnt Common Lane from me, so I know how often is floods, and that the water has even got into the gas mains on several occasions in the last decade. The land included an ancient woodland area, which can never be replaced; why remove this and all the creatures that live within it? The history around it, this area was very popular with the Tudors, and their history is part of our villages. Why are travelling show-people plots suddenly needed in this part of Guildford, there has never been a request for such before. It also is inconsistent with A50 Whittles Drive Normandy, which has approximately 14 sites that more than covers the need, therefore what reason is there to build even more in A43 Garlick’s Arch?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3848  Respondent: 11033057 / Jo Komisarczuk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A58 land at Burnt Common, London Road. I can think of no sensible reason to build warehouses in the middle of the greenbelt, and to change the word maximum to minimum, since the plan in 2016 is ridiculous. This change of wording has come with the removal from the Garlick’s Arch back to the original placement in A58. It is well known that there is a reduction in warehouse use currently nationally and that there are empty sites and warehouses that have already been built in Slyfield and Guildford, so why suddenly build even more that are not needed? There is no reason to take Green belt land for such a project especially as there are clearly no exceptional circumstances to require such a change in use. Building on this section of Green Belt will also cause even more congestion on the roads and lanes in the area, which were never built to be more than country roads and lanes, and no prevision has been made for improvement in infrastructure. There is a note that a waste management facility could be added at A58, but this addition will not allow for any discussion. Such sites are highly contentious and the Council has a duty of transparency, which is being completely ignored at best by the addition of a waste management facility.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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Policy 2 paragraph 4.3.15 states that Send Business Park will be taken out of the Green Belt. Why? There is restricted access by road to the site in both directions, it is next to the beautiful Wey Navigation and it detracts from the openness of the green belt.

I also object to the hiding of development by deferment A24, A25, A26, A43 within this version of the plan. These are concealed planned development and are designed to have two effects, to hide the true number of proposed properties being built with around 1100 hidden on A24, A25 and A26. Also, this looks to me to be an excuse to build on A43 Garlick’s Arch where developments are not needed. This is in my view dishonest. The proposed increase from 400 to 650 houses on this site is totally unacceptable and should not be allowed, especially as the plan in 2016 which was added into the plan during the meeting gave reasons that removing A58 Burnt Common started that “the site A43 location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm.... (site allocation A25) [than the Burnt Common site did”.

Now that A58 has been added back into the plan, and the separation issue is clearly being ignored as both sites which are almost contiguous are now in the plan, it would appear that Guildford Borough Council are not following their own guidelines and objectives. Also as A58 is now back in the plan then the required floor space is allocated surely and there is no reason to build on Garlick’s Arch.

Guildford Borough Council claim to be building on Brownfield sites in preference to Green Belt, if this was truly the case why is Site A4 removed from the plan? This removed housing from the plan in favour of retail, which means Green Belt land will be used to allow retail development, this policy is totally unacceptable. Site A34 is also being removed from the plan, another Brownfield Site which should be contributing to housing.

I completely object to the council giving developers an “out” on affordable housing Policy 4.2.23 by allowing a payment in lieu to enable the same amount of affordable housing as would have been developed on site. Where in this plan is this affordable housing actually going to be built?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<tr>
<th>Comment ID: PSLP16/11651</th>
<th>Respondent: 11033185 / Sarah Lee</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the Strategic Housing Market SHMA figure of 693 houses per annum as GBC refuses to publish the report and verify the figures.</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td>I object to the congestion that development will cause and the lack of road infrastructure.</td>
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<th>Comment ID: PSLPA16/2269</th>
<th>Respondent: 11033217 / Lemongrass Gardens Ltd (Christos Liasides)</th>
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<td>I object to not protecting the Green Belt.</td>
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After living in Horsley for 29 years I am strongly opposed to the changes that are proposed in the local plan for both East and West Horsley and the surrounding villages. I work in gardening and agriculture and am especially opposed to the changes the plans have on the land.

I strongly object to the proposed changes the plan would have on the Horsley and surrounding villages. These will uncharacteristically change the villages with a significant amount of history and heritage to make them resemble towns.

I hope these objections are listened to and that the Guildford Borough local plan is reconsidered to make better use of brownfield sites to protect the green belt, specifically in the Horsley’s and surrounding villages. I would like my 2 children and their families to be able to grow up and enjoy the beautiful village environment I was lucky enough to have in my childhood.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<th>Comment ID: PSLPP16/9512</th>
<th>Respondent: 11033217 / Lemongrass Gardens Ltd (Christos Liasides)</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>Additionally I object to Policy E8 – District Centres</td>
<td>It appears that the plan is proposing to expand in retail centres in rural areas. This is obviously to demonstrate that there is a demand for housing in said rural areas. This will harm the character of the surrounding villages I have lived in for the last 3 decades and there is no demand from the locals? Why would the borough council think this acceptable and risk moving trade out of Guildford town centre where a significant amount of money is being spent on redevelopment.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<td>Comment ID: PSLPP16/9511</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I specifically object to the Green Belt changes – Policy P2

There does not appear to have been any consideration to the value of the local Green Belt as a public and private asset. This is not just potential building land with additional restrictions it provides habitat for wildlife, the preservation of trees, much needed green space and areas of no pollution for our families to enjoy. There has been no consideration to the harm to public health on the removal of this land. I have seen this area flood multiple times and the development on the green belt will increase this frequency.

I have also been informed that the plan has allowed ruling Councillors to argue that there is an acceptable percentage of Green Belt that should be sacrificed to development, when no such rule exists in the NPPF. I was also informed that the plan ignores most of the NPPF 17 stipulations.

The plan has proposed a disproportionate amount of development to green belt land and very little in urban areas where a significant amount of the population want to live. 35% of the development being proposed for the Horsley's is also excessively high for one area to support without causing significant change.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7289  Respondent: 11033249 / Evelyn Scholfield  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to register my objections to the local plan in respect of matters affecting the Horsleys and surroundings.

The proposed increase in homes of 77% in the surrounding area will have an adverse affect in several ways:

TRAFFIC: Inevitably an increase in the amount of traffic, which uses narrow roads not intended for such volumes

PARKING: Parking at the shops and station is already overloaded, with no facility to increase.

MEDICAL AND SCHOOLS: Already full to capacity and no means of increasing.

INSETTING: Removal of the Horsleys from the Greenbelt protection will leave us vulnerable to further development on additional sites.

RURAL DISTRICT CENTRE: This seems to be based on designating Budgens as a large supermarket. Not so. It is a convenience store which allows it to open all day Sunday.
I have live in East Horsley for 34 years. We moved here because of its semi-rural location, which seems to now be under threat. Building on Green belt land, if allowed, will result in one great conurbation from London to Guildford.

I object most strongly to the local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<th>Comment ID: PSLPP16/13829</th>
<th>Respondent: 11033409 / Rebecca Fraser</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to express in the strongest possible terms my objection to the 2016 Plan. In particular I am concerned about the following, none of which appear to have been addressed by any revisions to the 2014 Draft Plan:

Schools:
Local schools are already at capacity and I am aware of several friends who have been unable to secure places at the schools closest and most convenient to them. Where will the additional children go to school? I object to the potential lack of school places.

Doctor’s Surgery:
It already takes between 7 and 14 days to obtain an appointment at the Horsley Medical Centre. With no additional medical facilities planned, this will create completely unsustainable pressure on already stretched facilities which I object to.

Local Road Network:
It seems that the Plan is proposing a strategic site at Wisley Airfield without even knowing what improvements to the local road infrastructure will be required. If that is the case for Wisley Airfield, then it is almost inevitably true for the proposed developments in East and West Horsley as well. I object to this. The local roads and parking at facilities such as Horsley station are already under significant pressure. The roads are already ridiculously busy and parking to visit the local shops already very difficult.

Traffic and Parking:
Assuming that every new house has at least 2 cars, this means potentially 6,000 more cars within a three mile radius of the villages. I object to thousands more cars and lorries on our local roads. The impact on local roads will be tremendous. Parking at Horsley & Effingham junction stations (which are already full), at the shops, at the medical centre and at the village hall will all be affected.

Transport:
Misery for commuters with full trains and nowhere to park. I object to fuller trains especially at commuter times.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/13833  Respondent: 11033409 / Rebecca Fraser  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

Policing and other emergency services:
Greater numbers of people in the area will obviously require more police and emergency services but these have not been accounted for. I object to the local police being stretched even further than they are already.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/13835  Respondent: 11033409 / Rebecca Fraser  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

Pollution:
The large increase in volume of traffic will cause an increase in nitrogen dioxide and particulates in the environment – already a cause for concern in several areas in the Borough. I object to higher levels of pollution in our villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/13831  Respondent: 11033409 / Rebecca Fraser  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Loss of Greenbelt Land:

I STRONGLY OBJECT TO BUILDING ON GREENBELT LAND. It is of paramount importance that we continue to protect our green belt and open spaces, especially when there are brown field sites available in the UK for development.

Creeping development has led to almost continuous housing from Central London to Effingham. Is this to carry on to Guildford and beyond? (1,700 houses are planned for the Guildford end of the Hogs Back and 1,000 new houses on greenfield sites in Normandy.) If we continue to build on our countryside it won’t be many decades before we have none left.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Flooding:

The site behind Ockham Road North in East Horsley is partially a level 3 flood risk area, and local residents (myself and my neighbours included, who live the other side of the railway tracks) are well aware of how much standing water there is in their/our gardens after rain. Building on such land will only exacerbate the problem. We already know what happens to local roads when it rains – the drains can’t cope. I object to more building causing flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I have objected to the scheme throughout the planning process.

1. I do not agree that the plan proposed actually meets the needs of the population needing housing and without sight of the study upon which the Council believe they need to do this it is difficult to make specific comment. The failure by the Council to release the report is a grave act against democracy.

2. Building a lot of houses with gardens is the most extravagant use of valuable land. There should be greater consideration to using land already in use to create viable accommodation and work by the use of apartments for single and double occupancy of which there is very little in the area. These facilitate the young getting on to the housing ladder and the old opening up the market of family properties.

3. The area is already over capacity with road congestion causing regular grid lock and pressure on schools and health care is at a premium level. Encouraging more people to the area is not practical.

4. Using valuable and viable farming land for houses is quite ridiculous. The Council should be looking to see how to assist the environment by reducing food miles and therefore keeping good farming land for the purpose it is intended for. This becomes more apparent following the EU Referendum result as it seems likely that even more of our food will now be brought in from the American and African countries thus increasing food miles and pollution.

5. We have seen in recent years the effect of war and how Great Britain had to struggle to survive. Every inch of land that could be cultivated was cultivated otherwise the nation would have starved. We are now living in very volatile times, war is not quite the ridiculous idea it may have once seemed and to give up food growing land to tarmac and bricks and mortar is short sighted.

6. Guildford is already at risk of flooding. Where will the water go with even more building around the town. The loss of trees to take up water, the loss of land to absorb water means the heavy rainfall we now experience is more likely to create flash floods.

5. I object to pushing farmers out of work and losing employment opportunities for those wishing to work on the land.

6. If the objections are not taken on board and the scheme goes ahead then the Council need to scrutinise to the enth degree of detail the builders financial position. This is an areas already severely hit by the EU Referendum and to start a scheme that the builder cannot then complete due to lack of finance would make the Council look very silly indeed.

I hope that the Council will reconsider all schemes for building more houses in this area and stand up to those in central government making such demands of the South East.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
In overall terms, Send residents are overwhelmingly opposed to the destruction of the Green Belt and the increase in traffic, pollution and lack of suitable infrastructure implicit in building significant numbers of new homes in Send. The continual eroding of the democratic process in Surrey, whereby local objections are not given due consideration by local planners has got to be reversed. Please listen to what local people are saying - it is incumbent on you that you do so!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/996  Respondent: 11033825 / Peter Heath  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send Marsh/ Burnt Common

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Send Village being removed from the Green Belt. The Green Belt was land put aside by our ancestors in perpetuity for the best of reasons – biodiversity, as a bulwark against urban sprawl (in providing an essential Green Space in stopping Woking and Guildford becoming one conurbation), wild life corridors and human appreciation of nature, to name but a few. Apart from anything else, Local Councillors and Central Government have given clear election promises to protect the Green Belt, as required by the National Planning Policy Framework – there are no “special circumstances” to justify abandoning it.

2. I object to building 400 houses and 7,000 sq. metres of Industrial Space at Garlick’s Arch, opposite Send Marsh Road. I object because this land is designated as Green Belt (see 1. above). It is also known that drainage in this area is bad, noise from the A3 will blight properties, traffic and population density will be considerably increased without any proposed improvement in infrastructure. If Industrial Space is required, it should be sited at Slyfield or the original proposed area of Ewbank’s Auction House at Burnt Common.

3. I object to building 45 houses at Clockbarn Nursery because it is Green Belt land (see 1. above) and there is not sufficient access for the resulting increased traffic volume. Previously approved Planning Permissions for apartments and Marina near the Tannery will of themselves generate increased traffic volumes - the narrow lanes could not take all this increased traffic and will make the junction with Send Road all the more dangerous.

4. I object to the development of 40 houses and 2 travellers’ pitches at Send Hill, again, because it is Green Belt land and has inadequate vehicular access potential. It is said the subsoil of the site includes unsafe landfill waste which is registered in documents in the possession of Guildford Borough Council.

5. I object to a new interchange with the A3 at Burnt Common because increased traffic from proposed sites at Wisley Airfield, Gosden Hill, Burpham and Blackwell Farm (approaching 6,000 houses in total) that needed to reach Woking and its railway connection with London, would have to go through Send. Send Road is already overloaded with traffic – its roundabout connection at Broadmead with Old Woking is always a stress point now – this extra traffic will swamp it! Noise and pollution levels, already dangerously high, will become toxic!

6. I request that my objections as detailed in items 1 to 5 above are shown to the Planning Inspector who will decide on each of the planning sites concerned.

7. Please confirm that you have received this letter.

In overall terms, Send residents are overwhelmingly opposed to the destruction of the Green Belt and the increase in traffic, pollution and lack of suitable infrastructure implicit in building significant numbers of new homes in Send. The continual eroding of the democratic process in Surrey, whereby local objections are not given due consideration by local planners has got to be reversed. Please listen to what local people are saying – it is incumbent on you that you do so!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to building 45 houses at Clockbarn Nursery because it is Green Belt land (see above) and there is not sufficient access for the resulting increased traffic volume. Previously approved Planning Permissions for apartments and Marina near the Tannery will of themselves generate increased traffic volumes - the narrow lanes could not take all this increased traffic and will make the junction with Send Road all the more dangerous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I write to object to the Proposed Submission Local Plan: Strategies and Sites June 2016 (the Local Plan).

I also write to fully support the written submission by West Horsley Parish Council written on this topic.

I also write to complain that this plan, which has been touted as written after listening the last consultation does not appear to have addressed any of the concerns raised by residents in the area I live.

I also wish to point out that, as I understand it, all previous correspondence is classed as "null and void", and that this is entirely disrespectful to the citizens of the borough who took time and effort to previously address the issued in the previous local plans. It is clear and apparent that the process is made as difficult, arduous and repetitive, to break down local opposition, whilst developers simply see this process as a step to doing business.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17819  Respondent: 11033921 / Tim Depledge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object - Again a wishy washy set of statements that any housing developer will say they comply with I pull our some statistics to prove compliance, but, will simply build a development designed to maximize returns. Furthermore, how will this be enforced??

I note that Policy D1 outlined in the Draft Local Plan states that new developments (in excess of 25 houses) must:

- provide a harmonious, integrated mix of uses, where appropriate, that fosters a sense of community and contributes to inclusive communities that provide the facilities and services needed by them
- provide places for communities to meet and interact, such as play and recreation and other public spaces

I cannot see how the proposed developments in West Horsley can meet these criteria. I also find it completely unacceptable that the Draft Local Plan lacks any reference to provision of additional services and addresses issues outlined above. How can we use this as a basis for future planning without considering these important issues, this therefore suggests the Draft Local Plan is not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17820  Respondent: 11033921 / Tim Depledge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
I object on the basis that it is contradictory - This policy is a pile of nonsense. The Local Plan is suggesting building on green belt land, in areas where there is already unsustainable demand for local services and poor access. Furthermore, the 35% increase in houses will lead to extra pollution, and we have a policy written here saying we should have low carbon development and decentralized energy networks ....

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17821  Respondent: 11033921 / Tim Depledge  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object based on how this is being applied - The "presumptive permission" implied by this policy is based on specific expectations which are all violated by building 35% extra homes in West Horsley, at density in excess of the current settlement

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17811  Respondent: 11033921 / Tim Depledge  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object on the basis of how this is being applied - The housing identified for East and West Horsley is clearly targeted to maximize profits for housing developers by all but two sites being in walking distance of a commuter station to London. Therefore these sites are targeted for London employment, and hence the policy is not being applied to the choice of locations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17814  Respondent: 11033921 / Tim Depledge  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object - this policy is designed to prevent development of brownfield land as housing in contravention of Government policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17816  Respondent: 11033921 / Tim Depledge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object on the basis of how this is being applied - The housing planned for West and East Horsley is not sustainable, and nobody can consider "reasonable" the thought of developing hundreds of homes are needed to help develop the "rural economy" of East and West Horsley.

Furthermore, insetting and settlement boundary extension will endanger appropriate rural activities listed that depend on maintaining our local area's rural character.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17817  Respondent: 11033921 / Tim Depledge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object - This is a wishy-washy policy written by someone who has clearly not been to Station Parade, East Horsley, written in such a way to justify future housing developments can be catered for by local shops. There is no room for expansion in East Horsley ...

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17818  Respondent: 11033921 / Tim Depledge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object - Again written by someone who has not been to Bishopsmead Parade, East Horsley ...

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17805  Respondent: 11033921 / Tim Depledge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Homes for all - I object - There is no need to meet an accommodation need specified in a document (the SHMA) which is neither transparent or reflective of current needs (especially considering the impact of the historic BREXIT vote in the recent referendum). I also understand that the basis behind the calculations, despite requests from some council members has not been shared.

I understand that an independent planning consultant has prepared a report which casts grave doubt on the assumptions in the SHMA and this is referenced in the West Horsley Parish Council response.

The Draft Local Plan is written in such a way to say "the population will grow [which I dispute the volume], and we should therefore provide houses for these people". We live in a free market country, and live by the premise of supply and demand. There is not a requirement to simply "supply all" without consideration of how this is completely detrimental to all current residents.

Why should existing residents be impacted by provision of huge increases in housing being built for those who do not currently live in the Borough?
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17807  Respondent: 11033921 / Tim Depledge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Affordable Homes - I object - I see no reason to set arbitrary targets of 40% affordable homes (and what is the definition of affordable), and the fact that 70% must be rented for the parish of West Horsley specifically. Also, what is the basis of the calculation of the number of affordable homes based on a SHMA which is neither transparent or appropriate to current needs?

Furthermore, market forces given the prosperity of the local areas and proximity to London mean this policy is simply not relevant or applicable.

I must ask where are these people supposed to work? My understanding is that affordable homes are provided for those individuals in the local community whose jobs are critical to the local infrastructure, but, may not earn sufficient money to be able to afford to live in the local community.

There can be no basis for over 200 Affordable Homes within the community in which we live, we are a small village within limited local services. This therefore assumes that people will be commuting to work in other communities. I reference in this letter the lack of public transport and the impact on the local road network in the area, hence, I am left somewhat at a loss to establish how such a large number of houses can be justified for the community of West Horsley, and East Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17806  Respondent: 11033921 / Tim Depledge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Rural Exception Homes - I object - providing affordable housing under whatever contrived definition is no reason to override the National Planning Framework's definition of exceptional circumstances.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17822  Respondent: 11033921 / Tim Depledge  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object - I have absolutely no faith that the council will enforce this, especially having seen similar situations, for example in the Salisbury area, where friends describe children being number 400 or so in the waiting list for swimming lessons having moved into new housing estates. I also note the word "should". There is no evidence that infrastructure will be enhanced, and in fact there is no opportunity for such growth in West and East Horsley. Hence, new housing will not be supported by new infrastructure, and hence existing residents will be made to suffer by increasing numbers of users of an already strained set of local services.

Furthermore, West Horsley's two main access points are "single file only" sandwiched between houses, hence, increased traffic will cause traffic nightmare which cannot be resolved through a CIL levy.

Only recently we have seen plots of land developed where old houses have been torn down, and new residences constructed. I am in favour of replacing dilapidated homes, but, must point out that the construction of these projects has damaged the road surfaces in the immediate vicinity. Hence, if one house construction can cause such damage to the road surfaces, imagine what 400 houses can do... Please see the image here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 2016_07_18_22_25_57.pdf (1.1 MB)

Comment ID: PSLPP16/17823  Respondent: 11033921 / Tim Depledge  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object - This policy is written the wrong way round stating housing should take into account the development needs of the A3 / M25. The roads should be upgrade first to prevent gridlock and congestion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object - Has the person who wrote this policy visited the villages which are supposed to be subject to it. This is a generic list of town centre initiative which people aspire to, not a realistic set of principles for a village environment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object - This policy is totally contravened by the suggestion to build thousands of homes on greenbelt land.

Policies A36, A37, A38, A39, A40 and A41- I object to all:

- I can categorically say based on the results of a survey of local West Horsley residents that these developments are not wanted by the existing residents
- There is absolutely no justification for this number of houses to meet the needs of the local. It is clear these sites (with the exception of A36 and A37) are located to maximize profits for landowners and developers targeting commuters to London, not for the benefits of current residents of the Guildford Borough.
19th August 2014, during an interview on the Radio 4 Today Programme, Jeff Fairburn, the Group Chief Executive of Persimmon Homes outlined that building on Green Belt land is significantly profitable for his company, more profitable than building on Brownfield land. This will be the case for all house builders.

Hence, the Draft Local Plan is allowing development in Green Belt areas, solely at the expense of local residents, generating substantial profits for house builders, without investment in the local community.

Furthermore, I note all but two sites within West and East Horsley has been located within approximately 1 mile of the railway station, effectively positioned in "prime commuting area", clearly demonstrating that the location of proposed housing has identified to maximize profits, at the expense of the local communities in which we live.

I note that there is community levy applied to new homes, but, would be very surprised if the small amount of £300 per square meter in the villages is sufficient to provide appropriate infrastructure.

Furthermore, land, when released from the Green Belt increases in value exponentially, generating windfall profits for Again, inconvenience on the local residents, windfall profits for a small number of individuals, or even corporations, who may not even be resident in the UK.

- The density the housing far exceeds that currently in place in the village settlement. The proposed density of the housing developments is completely out of character with the village of West Just looking at the style of development being built in other locations in high density configurations shows that this will not be in keeping with the community which has existed here for many years, therefore changing the character and sustainability of the location forever.
- The Raleigh School, which is oversubscribed each over 400 new houses are listed in the Draft Local Plan which will be within close proximity to the school, therefore increasing further the shortage of schooling, and also "gazumping" those who have lived in the village before them.
- The local medical facilities, which are also extremely busy.
- The local shopping facilities - there are very limited numbers of shops in West Horsley, and the nearby facilities in East Horsley are extremely busy, again with very limited congestion will become unsustainable.
- All but Site A36 are located the Local Plans designated "Surface Water Hotspot" area, why build on areas of where surface water already builds up, recent newspaper headlines can surely demonstrate this is a bad idea.
- West Horsley is treated with disdain by Guildford Borough Council, why is this one small parish subject to a 35% increase in the number of dwellings whereas Guildford (11%) and Ash / Tongham (16%) are much less affected? Could this be because that's where the majority of local councilors live?
- The density proposed will require houses completely out of character with the local environment.
- The local pavements in the area are already riddled with potholes and narrow passageways, hence, not appropriate for further expansion.
- The existing roads (specifically East Lane) already has such a high number of dangerous potholes, and these do not get how can it be considered safe to increase the number of houses, and hence increasing the volume of traffic on the roads during construction and occupation when the existing roads are not fit for purpose.
- The local roads and specifically I would like to draw your attention that the majority of this housing would be required to transition a section of road which is not wide enough for two lanes of marked traffic to pass to travel from West Horsley to Guildford - this seems ridiculous to place hundreds of additional new homes in an area where the roads cannot cope already (the potholes in the Village are already beyond a joke).
- Public Transport - There is very limited public transport in the area beyond the already crowded trains to London and consistently full parking at Horsley.
- The local services - for example the local sewerage system is already stretched and East Lane (behind the Manor Farm proposed development) has been subject to significant disruption due to overloading and the natural high water.

Therefore, existing facilities are already full to bursting, the roads to Guildford are unable to cope with the increased traffic, and the trains (and parking) are already full, the impact upon the existing community will be detrimental. The development in West Horsley can therefore not be considered as sustainable.

I consider the attack on the community of West Horsley to be unwarranted. No other community in the borough of Guildford has the targeted number of homes.

In the event that growth in the borough is required this should be considered fairly across the borough.
The spatial vision of the Local Plan states:

This is achieved by maintaining the extent and function of the Green Belt in such a way as to protect the existing character of the borough through maintaining the clear distinction between urban and rural areas and safeguarding the natural, built and historic environment. All new development will be of exemplary design and bring with it the necessary infrastructure and services required to enable future and existing communities to live sustainable lives....

and over 750 dwellings as extensions to existing villages. These dwellings will offer a variety of housing choice in villages and help contribute to supporting local services and the important role they play in village life.

This statement is breached fundamentally by the presumption to end the Green Belt Protection for West and East Horsley. Furthermore, none of the housing plans are accompanied by plans for the necessary infrastructure to support the housing programs. Any sensible person will tell you its necessary to have infrastructure in place before you build houses where people live, otherwise this places an unfair burden on existing residents.

Furthermore, how is it fair on the existing community of West and East Horsley that 2/3 of the 750 village dwellings are focused in this one area?

To summarise, the Draft Local Plan violates enshrined national law regarding the Green Belt, places unsustainable strains on the local services, changes forever the nature, spirit and feel of the community, generates profits for corporations, a small number of individuals, these funds may not be kept in the UK, and almost certainly will not be reinvested in the local community. Furthermore, the significant majority of housing is for those individuals who do not currently live in the Borough. There are no positives to take from this plan for the local residents of West Horsley, only inconvenience and imposition of irrevocable change.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/17808</th>
<th>Respondent: 11033921 / Tim Depledge</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object on the basis of how this is being applied - The policy states "We will continue to protect the Metropolitan Green Belt", but, based on the proposals of housing locations, this policy is not being followed. Furthermore, it has been clearly stated that building on the Greenbelt may only be allowed in exceptional circumstances, and none of the elements in this plan, including meeting the arbitrary "needs outlined in the SHMA" are appropriate to be called "exceptional".

I fundamentally object to building on Green Belt land. Building on Greenbelt land can only be allowed in "exceptional circumstances", and the local plan does not come close to justifying exceptional circumstances. A broad brush statement in section 4.3.16 of the Local Plan saying "We consider that exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development" is not justification for building the green belt, and certainly not in West Horsley. Green Belts are established in law and well ingrained into the society in which we live.
Section 9, Point 89 of the Government's National Planning Policy Framework outlines these "exceptional circumstances", and none of these apply to the extensive plans for new homes outlined in the Draft Local Plan. I also note that the Government is committed to safeguarding the Greenbelt.

The Local Plan places the majority of new home construction on Green Belt land in the next five years, and for the duration of the plan, how can this be possible? Brownfield sites should be the focus for growth. This is especially true when the economic growth areas of the borough are not in the areas where building is planned on Green Belt land.

Furthermore, once a Green Belt is infringed, this removes significant requirements for planning consent going forward, creating yet more disturbance and pain for residents in the future.

The same reasons outlined for removal of the Green Belt also apply to insetting of the Green Belt. There are no exceptional circumstances to inset the Green Belt in West Horsley. I understand the Parish Council has performed an analysis of housing demand within the Village and this is limited to a small number of homes, (~30) which can be accommodated without decimating the village through building hundreds of homes through insetting the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17809  Respondent: 11033921 / Tim Depledge  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object - How can it be sensible to protect areas further from London i.e. Ash and Tongham (the direction from which urban sprawl comes) over the villages closer to the M25 with commuting access to London. This is clearly politically biased (I understand a number of senior council members past and present live in Ash and Tongham) and focused on maximizing profits for housing developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17810  Respondent: 11033921 / Tim Depledge  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object on the basis of how this is being applied- In the surface water hotspot map in the Local Plan, the area of all developments in West and East Horsley and in a hotspot area. How can the application of a sensible policy be to build houses in a surface water flooding hot spot?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPP16/17803 | Respondent: | 11033921 / Tim Depledge | Agent: |
|-------------|----------------|-------------|-------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy S1 | |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) | |
| Answer (if comment is on questions 1-7 of the questionnaire): () | |

Presumption in favour of the Green Belt - I object on the basis that his has not been followed based on the proposals within the plan - The proposals made do not allow sustainable development, or require it. How can c400 houses in West Horsley be classed as sustainable based on the lack of infrastructure and fact they are located a “flooding hot spot”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPP16/17804 | Respondent: | 11033921 / Tim Depledge | Agent: |
|-------------|----------------|-------------|-------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 | |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) | |
| Answer (if comment is on questions 1-7 of the questionnaire): () | |

Planning for the borough - our spatial development strategy - I object- The basis of the calculations are neither transparent, nor, appropriate given the recent landmark changes in our nation's direction and future. Also, an assumption to meet a defined target which cannot be justified cannot be considered reasonable within the modern age.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPA16/1622 | Respondent: | 11033985 / John Peachey | Agent: |
|-------------|---------------|-------------|-------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base | |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the exaggerated "housing need" figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way student's economic need and affordability are calculated inflates the housing need. I believe that the SHMA of 2015 is highly questionable as the number of foreign students has been wrongly used to inflate the housing need. The figure of 13,860 houses is excessive, as a population increase would only need about 8000 homes at an average of 2.5 persons per house. About half of these houses could be built on brownfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1621  Respondent: 11033985 / John Peachey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the building on the Green Belt at Send at Garlicks Arch, Clockbarn Nurseries and Send Hill because it is not justified by any "exceptional circumstances" and the fact that Green Belt is meant to be permanent and not continually eroded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3122  Respondent: 11033985 / John Peachey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the large proposed development at Site (A35 - 2,000 houses at former Wisley Airfield (already rejected by GBC), Site A25 - 2,000 houses at Gosden Hill Farm and the 1,850 houses at Blackwell Farm, because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Site A42.-- I object** to building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. It is also subject to flooding. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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**Site A43. I object** to the development at Garlick's Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks' notice and without any prior consultation and is not required in terms of housing need either for the village or the borough.

**Site A43. I object** to the proposed industrial development of 7,000 sq m at Garlick's Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40 hectare site available.

**Site A43. I object** to the development at Garlick's Arch because the site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The site is also subject to

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A43a - I object to the proposed new interchange onto the A3 at Burnt Common because if would be disastrous for Send and the A2.47 Send Road / Broadmead to Old Woking a would be gridlocked all day. There are schools, shops and a bus route along this already congested village road. In the other direction the A2.47 towards Newlands Corner - the section between the Onslow Arms and Glandon Park is very narrow with bends and there is only just room for cars to pass each other but lorries and buses have to mount the footway.

Site A43a I object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25. This interchange will cause dangerous queueing on the A3 in both directions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPS16/3120</th>
<th>Respondent: 11033985 / John Peachey</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A44 - I object to the development of 40 houses at Send Hill due to its high quality Green Bltamenity within an area of beautiful countryside which would be The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/6759</th>
<th>Respondent: 11033985 / John Peachey</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<tr>
<td>I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing! Roads, doctors and schools will be unable to cope.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<tr>
<td>I object to the removal of Send from the Green Belt because the village and its countryside provide a necessary buffer between Woking and Guildford.</td>
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<tr>
<td>I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford's urban brownfield areas much closer to existing transport hubs.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<th>Comment ID: PSLPP16/6758</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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</table>
I object to all the proposed sites in Send because they were not included in the previous consultation in Unlike the rest of the borough, Send has not been properly consulted and all its sites have been changed substantially.

I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads, including the A247 which are all already at 100% capacity. GBC has completely failed to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and Green Belt. GBC have also failed to include the Town Centre Masterplan 2015 within the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: pslp173/71</th>
<th>Respondent: 11033985 / John Peachey</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Local Plan proposes an increase of 500 homes in Send, that is nearly 30%. (40 at Send Hill, 60 at Tannery Lane and 400 at Garlicks Arch).

In addition, within a few kilometres there are proposals for another 4500 homes (2000 at Wisley and 1500 at Gosden Hill Farm).

Add to this the proposal to build 10 hectares of industrial/warehousing at Burnt Common.

Add to this the proposal to build north and southbound interchanges onto the A3 trunk road at Burnt Common.

This is not sustainable for such a location as Send and Ripley as there is not the capacity to upgrade the infrastructure to accommodate such increases.

Existing residents, roads and facilities will overwhelmed.

The consultation of Guildford's Local Plan in 2016 produced over 33,000 comments and one third of these came from Send.

Send appears to have been allocated additional development in this latest submission despite a reduction of the overall housing numbers in the borough, plus an increase of industrial/warehousing development.

Guildford Borough Council have requested a consultation and comments from local residents. They must take on board the comments and modify the submission accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: pslp172/591 | Respondent: 11033985 / John Peachey | Agent: |
Site A42 - I object to building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more. It is also subject to flooding. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/623  Respondent: 11033985 / John Peachey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A42. Clockbarn Nursery, Tannery Lane, Send.

Increase from 45 homes (previously) to 60 homes.

This is a 33% increase in a small location, which is excessive and ignores hundreds of previous objections by local people.

It will make worse the traffic problems in the narrow and winding Tannery Lane. There has already been a successful application for 64 houses at the Marina further down Tannery Lane and another application is pending to build houses on the garage site on the corner.

The junction with Tannery Lane and the A247 Send Road is notoriously difficult to negotiate. The bad surface water flooding in the Lane will become worse.

It will adversely affect the open countryside views from the River Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/627  Respondent: 11033985 / John Peachey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A43. Land at Garlick's Arch, Send Marsh, Send

Now 400 homes and 6 Travelling Showpeople plots.

This ignores thousands of objections from local people and there is no proven demand for Travelling Showpeople plots in this location.

There are no 'exceptional circumstances' to remove this from permanent Green Belt and it will cause over development of Send Village.

It will remove the green break of ancient woodland between Send and Ripley. The site is flood zone 2 allocation and frequently floods.

Excessive traffic will be generated and block up the local roads of Send and Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/592  Respondent: 11033985 / John Peachey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A44 - I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/629  Respondent: 11033985 / John Peachey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58. Land at Burnt Common, London Road, Send

Changed from 'maximum' 7000 sq m to 'minimum' 7000 sq m of industrial or warehousing. This is not justified as there has been a decline in requirement for industrial land.

There is no need to build industrial/warehouse development on Green Belt when Slyfield and Guildford still have empty sites.

The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares of industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt.

The vans and heavy goods vehicles will create traffic gridlock in the villages of Send and Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/67  Respondent: 11033985 / John Peachey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

GBC has completely failed to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and Green Belt. GBC have also failed to include the Town Centre Masterplan 2015 within the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/73  Respondent: 11033985 / John Peachey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy 2 at paragraph 4.3.15.

Send Business Park now taken out of the Green Belt altogether.

It is an old non-conforming user in an area of outstanding countryside adjacent to the Wey navigation.

There is highly restricted vehicular access along this narrow winding lane.

This location is totally unsuitable for further expansion/development and it will detract from the openness of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)
   North facing ramps to the A3 at Burnt Common would be a disaster for local communities, which do need to access the A3 to the north, but the addition will draw in a huge amount of “through” traffic. E.g. all traffic from London/M25 to Woking would go through Burnt Common, Send and Old Woking. This is not sustainable as this cannot be improved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1612  Respondent: 11034113 / Julia Gaudelli  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)
   There is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that. The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses means dangerous and unsustainable traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1611  Respondent: 11034113 / Julia Gaudelli  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to not protecting the Green Belt (Policy P2)
   I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; composes with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- The proposal to remove Horsley from the Green Belt cannot be justified. No exceptional circumstances or justification has been made. The Green Belt and Countryside Study is flawed.

- The proposal to extend the boundaries of the settlement areas has not been properly thought through. It appears that the reason behind this is solely to increase the amount of land available for development. The residents of West Horsley are totally opposed to the village’s removal by insetting and extending the 2003 Local Plan Settlement Area.

  The boundaries do not need to be extended.

  - West Horsley Parish is one of a rich and varied mix of well-established low density housing settlements with many historical buildings. Positioned on the North side of the North Downs, partly in the Surry Hills AONB, it attracts walkers and cyclists all year round.

The Key Evidence Document GB Economic Strategy 2013-2031 makes no case for locating large numbers of homes in either East or West Horsley or neighbouring villages.

- The scale of the increase in housing is disproportionate to the village. It would mean an increase of 35% of households within the village, greater than any other single area in the borough. Can Guildford Borough Council (GBC) tell us why we have singled out for this massive increase. 385 new houses could not be accommodated without extensive investment in roads, schools and medical facilities. Our local school is already full and oversubscribed. Drainage is inadequate and we suffer from flooding after each period of heavy rainfall. It would also alter the very heart of our village. With only one small shop, no Post Office, limited bus service, it is clearly unsustainable for the proposed high volumes of new housing. The development of these homes would be of a much higher density than already exists and would be totally out of character with the existing mix of homes.

- Thames Water has advised GBC that the areas waste water network is unlikely to be able to support the demand anticipated from all the proposed developments.

- The inflated number of houses arises from a Strategic Housing Market Assessment (SHMA) that was generated from a theoretical model which has not been revealed to the public or indeed to GBC. The SHMA target housing numbers is then further increased by GBC to give a population increase which is almost 70% higher than the official national estimates for population growth in the Borough. The need for so many houses to be built in West Horsley is totally unproven.

- The West Horsley Parish Council and Surrey Community Action Housing Survey identified the need for some 20 houses for local people who wished to remain in the village.

- I am also very concerned about the proposals to build a new town at Ockham, (Wisley Air Field), the extensive developments at Burnt Common and Gosden Hill Farm. The impact on our village of such huge developments under 2 miles away would be enormous.

I have lived in West Horsley for 30 years. I have enjoyed the semi-rural atmosphere and the strong community spirit that ties the residents together. There has been some new housing and other developments within the village during this time,
but it has been with due regard to the environment and the protection of wildlife habitats and done in a sympathetic way as to maintain the character and minimise the impact on the very fabric of our way of life.

I urge GBC to reconsider these drastic proposals and listen to the concerns of the people of West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/6570  Respondent: 11034337 / Judith Hill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to say that I OBJECT VERY STRONGLY to POLICY A46. I see no exceptional circumstances for releasing this site from the Green Belt. I am also concerned that Normandy will become simply a suburb of Guildford and it will lose all identity as a village. There is only a need for a secondary school in this location if a large number of houses are built, so it cannot be justified as a separate entity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13778  Respondent: 11034337 / Judith Hill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also STRONGLY OBJECT to A27, A28, and A29. I can only imagine the impact this will have on local traffic. The roads are already far too busy, and the existing infrastructure is already under pressure. Also, there are already flooding problems in parts of Ash.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/127  Respondent: 11034337 / Judith Hill  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Any increase in traffic along the A323 is totally unacceptable. Any plans that are eventually implemented must have access elsewhere as this road is already up to capacity, especially if there are problems on the A3. This area is still rural and inhabitants need to be able to walk safely along footpaths and cross the road.  
2. I have no objection to the rerouting of the road over the railway line provided there is a footbridge at Ash station and there is no other building in the area. With more local traffic the problems will just be rerouted. Why not reroute the road to accommodate a bridge over the existing road?  
3. The addition of office accommodation near Ash station might be handy for commuters but it would just add to the traffic chaos. Presumably this would again hit the A323, or Ash Hill, which is always busy in the rush hour.  
4. Drainage continues to be an issue in the area, with flooding in parts.  
5. This is all Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/910  Respondent: 11034625 / Charlotte Fletcher  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to STRONGLY OBJECT to proposals made in the Guildford Borough Proposed Submission Local Plan.

Removal of Horsley from the Green Belt.

The Planning Policy Framework states that land should only be taken out of the Green Belt in exceptional Circumstances. The prime reason for the Green Belt being the protection of the countryside from urban sprawl. With continuing pressure for development this remains even more important today. There is also a requirement to safeguard the countryside from encroachment. Horsley is a village set in attractive countryside. The Green Belt designation is required to maintain the character of the village and the area, not just for the residents but also for the many visitors walkers, cyclists, golfers from London and the rest of the UK and abroad who come here to enjoy the countryside and stay at the campsite and local hotels.

The allocation of over 533 houses in The Horsleys is excessive and disproportionate and will detrimentally affect the character and appearance of the villages. This is not just the housing estates themselves but the cars (at least an extra 1000), congestion generated, the pressure on the existing local infrastructure: primary and secondary schools, doctors, sewerage, surface water, parking at the shops and stations. The Horsleys will become a congested urban area.

The loss of Green Belt protection, by ‘insetting’ would mean a presumption in favour of development. This would lead to pressure to develop every small parcel of open land in the area. No provision has been made to protect existing open areas
such as Nightingale Crescent, Kingston Meadows, play area adjacent to West Horsley village hall, land adjacent to West Horsley Motors on The Street and Weston Lee playing fields, to name a few, should they be removed from the Green Belt.

There is no justification for altering the development boundary – the villages need to continue to grow slowly and incrementally so that it does not put adverse pressure on services and the local infrastructure.

Brownfield sites must be developed before any Greenfield sites are considered.

**Infrastructure**

The NPF requires that new residential development must respect the character and density of housing in the area and be limited in quantity by the availability of infrastructure and local facilities.

The proposed amount of development is not sustainable

- There is no extra capacity at the local primary or secondary schools.
- The doctors surgery can not cope with current demand
- Existing flooding problems will be exaccerbated
- Foul water sewers regularly overflow
- Parking at the station and local shops is at capacity
- Mobile phone reception and broadband connections are poor
- An extra 1000 cars will lead to huge amounts of extra traffic on narrow country roads.
- The proposed densities will be out of character with the area

Guildford Borough Council is proposing a large percentage increase in the housing stock in Horsley with NO consideration whatsoever on the affect on the local infrastructure.

**Proposed Development Site A41**

The proposed development of this site would be seriously detrimental to the character and rural appearance of West Horsley. This land is open countryside and adjoins a group of old buildings, some of which are listed, along the historic bridleway of Lolesworth Lane. It is important that the setting of this group of buildings is maintained so that social history of West Horsley is not adversely affected. Development here would set a seriously undesirable precedent, whether it is for houses or a school.

**Proposed Development Site A40**

Of particular concern is the triangle of land to the south west of Waterloo Farm, which backs on to the campsite and the rear gardens of properties in Nightingale Crescent. This site was originally a paddock, but has now been absorbed into the grounds of Waterloo Farm, an old farmhouse, which although not listed is over 150 years old. The proposed development would seriously affect the character and setting of this historic building and would create a piece of suburban back land development.

This site is restricted by a main sewer running along the western boundary (along the fence adjacent to the campsite). Other sewers from Nightingale Crescent, cross the site and feed into this main sewer. The existing main sewer can not always cope. We have lived at 36 Nightingale Crescent for 16 years and the sewer which runs through no 38 has backed up twice causing raw sewage to flood into our rear garden.
Nightingale Crescent slopes down to this site and surface water sewers also cross the site and drain into the lake in the camp site. Our garden together with the proposed housing site and the campsite are often waterlogged and regularly flood. Please see attached photos.

Housing development will further increase these problems by generating additional surface water run off.

One of the reasons for refusing outline planning permission for the erection of three detached dwellings (access only to be considered). R14/P/00012 on 27 Feb 2014 was:

The proposed development of three dwellings has the potential to increase the risk of flooding in an area with a high risk of surface water flooding. No information has been submitted to demonstrate how the development would successfully mitigate against flooding. This is contrary to policy and G1(6) of the Guildford Borough Local Plan 2003 (as saved by CLG Direction on 24/09/07) and guidance contained in the National Planning Policy Framework.

Given that development would be constrained, its inclusion for a small number of houses would not outweigh the value it has in maintaining the rural character and setting of Waterloo Farm.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 
Flooding at Waterloo Farm (2) June 2016.jpg (490 KB)  
Flooding at Waterloo Farm February 2014.jpg (645 KB)  
Rear of 36 Nightingale Crescent June 2016.jpg (751 KB)  
Flooding at Waterloo Farm January 2014.jpg (630 KB)  
Flooding at Waterloo Farm June 2016.jpg (532 KB)  
Flooding at Waterloo Farm January 2015.jpg (649 KB)
In response to the Guildford Borough Proposed Submission Local Plan: strategy and sites: June 2016 (The Guildford Plan) published by the Guildford Council on 6th June 2016 I strongly object to developing new sites and building new housing in West Horsley and East Horsley villages including all the sites proposed in the local plan:

• A37 by the Epsom Road;
• A38 Land along East Lane from Northcote Road to Long Reach;
• A39 Land in East Horsley by the Horsley rail station;
• A40 Land at rear of Ockham Road North;
• A41 Land along Lollesworth Lane in between East Lane and railway

To begin with it is extremely disappointing that the Guildford Council has completely ignored objections previously received from residents of the villages in response to the last local plan consultation ending in September 2014 and published Proposed Submission Local plan with intention of building 385 new homes in West Horsley, an increase of 35% on the current number of homes with just a slight change in the identification of specific sites for this proposed development.

Once again as resident of the village I strongly object to this proposal.

The main reason against development of these sites is that the proposed strategies will remove the villages of East Horsley and West Horsley from the Green Belt, which is against the fundamental concept of the Green Belt as it is supposed to be the policy that immutably keeps the areas designated as the Green Belt out of projected development to retain these areas as undeveloped to surround neighboring areas.

The requirement for increase in housing is not and cannot be considered the reason for removing the villages from the Green Belt as in order to do so the potential to build in the areas which are not classed as the Green Belt has to be completely exploited which is clearly not the case in the Guildford Borough. In the Policy P2 of the Guildford Plan there is absolutely no justification for changing Green Belt boundaries that have been set up by the national legislation. According to planning and Greenbelt policy, Green Belt land can only be built in in exceptional circumstances, there are absolutely no "exceptional circumstances" outlined in the local plan to justify this encroachment in whatever form onto Green Belt land. Hence, I object to this policy statement.

The area near East Horsley and West Horsley villages is classed as Area of Outstanding Natural Beauty and attracts many visitors from London to spend time in the picturesque countryside of Surrey Hills which villages of East and West Horsley are part of. The village of West Horsley has low density housing set up with a considerable number of traditional English cottages, which contribute to the countryside character of the area. New housing in the village, especially at the density proposed will completely destroy the character of the village and will make it look like a suburban area of London or Guildford. This is particularly the case if building affordable homes in the village of West Horsley is considered as these type of housing is always high density and makes a drastic change to the outlook and demographics of the area. It is completely wrong to change the outlook of the village just because more housing has been identified as needed based upon a floored and intransparent SHMA which is then being imposed upon the villages by Guildford council. The effect will be to make the Horsleys a small town rather than a village. The concept of limited infilling that the Guildford Borough Proposed Submission Local Plan is discussing in Section 4.3.24 - 4.3.27 of Policy P2 Green Belt is absolutely ridiculous as building of additional 385 homes in West Horsley and 100 homes in East Horsley can not be considered as limited infilling (It is 35% increase on the current number of homes!!!).
Building new houses in the villages of West Horsley and East Horsley is against Protecting Policy P1 of The Guildford Plan as the areas of Surrey Hills and nearby villages have to be preserved as areas of outstanding natural beauty. This proposal is also against National Planning Policy Framework which clearly states that "inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances".

There are no special circumstances that justify such massive development in the Green Belt areas as development on brown sites in Guildford borough has not been done to full potential. It is inappropriate that 64.6% of all proposed new homes are to be built in the Green Belt. There is absolutely no justification for this.

The discussion of Policies P1 (Surrey Hills Area of Outstanding Natural Beauty) and P2 (Green Belt) is self contradictory in the Guildford Borough Proposed Submission Local Plan document as it talks of necessity to preserve such areas and at the same time very badly justifies exceptions and limitations to the rules which is unacceptable.

The next argument against development of new homes in the villages is due to limitations of current infrastructure. The village cannot be expanded with any new housing developments as the infrastructure in the village is already exploited to its full potential.

- The schools are oversubscribed in The Raleigh school has been full every year for a number of consecutive years. There are not enough secondary schools apart from Howard of Effingham School (which has limited capacity) within the area.
- The doctors surgery is operating at its full capacity and it is often difficult to get an appointment already with the current population in the villages.
- West Horsley village mainly depends on the infrastructure of East Horsley as it does not have its own post office, has only one shop and therefore additional housing proposed for West Horsley village will not be sustainable.
- New housing will create an immense burden on the drainage system in the villages and roads network, which in some places is not wide enough for cars to pass each other.

Current wastewater system will not be able to support these proposed developments. The proposed developments are all located within the “surface water hotspots” as identified within the Local Plan itself.

Public transport in the village is non-existent. There is only one bus which runs only on weekdays and on a very limited schedule and cannot be considered as a means of transport to rely on to get to work either in Leatherhead or Guildford.

The car park at the train station is full during the day and will not be able to accommodate more cars. The roads (Ockham Road, East Lane and The Street) will become busy traffic roads instead of semi-busy village roads in case new housing is built in the area.

Based on the above it is clear that this does not comply with Policy S1: Presumption in favour of sustainable development. In order to keep the area sustainable there should on the contrary be no additional housing development in the area as local services and infrastructure are already at breaking point.

The National Planning Policy Framework (NPPF) requires that new residential development MUST respect the character and density of housing in the area and be limited in quantity by the availability of infrastructure and local facilities. Although Guildford Borough proposed Local Plan talks about sustainable development there is no consideration for development of infrastructure in the villages of East and West Horsley.

It is clear that potential new residents of West Horsley and East Horsley villages will have to be employed either in London or Guildford town. The fact that there is no public transport system in place to support alternative commuting options is discussed above. Furthermore economic development of Guildford Borough for the foreseeable future does not require additional housing to be built in West or East Horsley. None of the strategic employment sites mentioned in Policy E1 (office B1a and Research & Development B1b Strategic Employment Sites, Guildford Town Centre employment core, Surrey Research Park, Guildford Business Park, London Square, Cross Lane, 57 and Liongate Ladymead) are near the Horsleys hence it would make much more economic sense to find solution for building new houses close to new economic development sites and not in the Green Belt area.

It is clear that one of the main incentives for building new housing in the villages is opportunity of selling new houses at premium as the villages are within commuting distance to central London. Hence with regard to "fairness", how is it
possible to support this plan, which prioritizes profits for housing developers, and landowners (who most likely either do not live in the area, or will move away from the building based on their windfall profits), and imposes costs (financial and lifestyle) on those who live in the community? The balance of houses have been identified as for 40% of the developments to be “affordable homes”, there is absolutely no reason to suggest that the residents of the Horsley's have a need for over 200 affordable homes. Surely it makes more sense for houses to be built in areas which are sustainable, in areas with appropriate infrastructure, and close to the local area in which people who buy the houses work?

Having discussed above the arguments why additional housing will become an unsustainable burden for the existing infrastructure and unfairness of development on the Green Belt which is both unbalanced and unsustainable I would like to reiterate my main objection that there is no justification for removal of the villages of West and East Horsley from the Green Belt. I strongly oppose the removal of the villages from the Green Belt also because it sets up a vicious precedent to exploit the opportunity and destroy the area of outstanding natural beauty in the future beyond the timescale discussed in the current local plan.

The suggestion in the local plan to create new areas of the Green Belt between Ash Green village and the Ash & Tongham urban area to compensate for the removal of the villages of West and East Horsley is not enough. There is no need to destroy certain areas of the Green Belt to create others

Why should Guildford Council enforce the construction of new homes, in areas which are unsustainable, where infrastructure is insufficient, in areas where the local community objects, changing the face and demographics of villages in order to generate profits for house builders, and enable the council to declare it can meet an unjustified housing demand?

I once again would like to reiterate that I strongly object building of new houses in the areas discussed in the Guildford Borough Proposed Submission Local Plan: strategy and sites: June 2016 in the villages of East and West Horsley particularly as I am against removal of the villages from the Green Belt. I trust that my opinion and my comments will be considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/1436  **Respondent:** 11034817 / Nick Pycraft  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I am writing to you to protest about the plans for building on Green Belt sites in and around Send and Send Marsh.

I object to Send being removed from the Green Belt (Policy P2). The National Planning Policy Framework (point 80) states that one of the purposes of Green Belt land is ‘to prevent neighbouring towns merging into one another’. Send village and its surrounding Green Belt land acts as the necessary buffer between Guildford and Woking.

I object to the building of 45 houses at Clockbarn Nursery. Planning permission has already been given for 64 houses in Tannery Lane, an area already unsuited to further development, due to both its frequent flooding and the narrow and winding lane. The lane simply cannot take the traffic an additional 45 houses would bring.

I object to the proposals for the development of 40 houses and 2 traveller's pitches at Send Hill (Policy A44 . 1.9 ha). The single track road would not be able to take the additional traffic, leading to potential gridlock. Send already suffers near
gridlock in the mornings and especially in the evenings as vehicles travel through the village from the A3 to Woking and vice versa. This is also the case during the morning and afternoon school runs, with two schools in Send. This also raises the concern of safety for pupils and parents at these times.

I object to the proposed new interchange onto the A3 at Burnt Common for the same reasons as above; namely due to Send and Send Marsh not being able to cope with the additional traffic.

I object to the development at Garlick's Arch for 400 houses and 7000 square metres of industrial space. This area is prone to flooding. It also has ancient woodland, just the kind of specific area the Green Belt was established to protect. The industrial space is also unnecessary, based on the current Employment Land Needs Assessment 2015 (ELNA). This shows a reduction of 80% in required employment floor space from the previous draft plan.

I also understand that Slyfield actually has a large area which would be much more suited.

I object to the Plan due to the fact that the infrastructure of Send and Send Marsh simply cannot cope with the increased traffic and also the strain on local services such as the schools and the surgery. I urge you to abandon the Plan forthwith.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2227  Respondent: 11034817 / Nick Pycraft  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the building of 45 houses at Clockbarn Nursery. Planning permission has already been given for 64 houses in Tannery Lane, an area already unsuited to further development, due to both its frequent flooding and the narrow and winding lane. The lane simply cannot take the traffic an additional 45 houses would bring.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2230  Respondent: 11034817 / Nick Pycraft  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the development at Garlick’s Arch for 400 houses and 7000 square metres of industrial space. This area is prone to flooding. It also has ancient woodland, just the kind of specific area the Green Belt was established to protect. The industrial space is also unnecessary, based on the current Employment Land Needs Assessment 2015 (ELNA). This shows a reduction of 80% in required employment floor space from the previous draft plan.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
| Comment ID: | PSLPP16/4839 | Respondent: | 11034817 / Nick Pycraft | Agent: |
|------------|--------------|-------------|-------------------------|

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Plan due to the fact that the infrastructure of Send and Send Marsh simply cannot cope with the increased traffic and also the strain on local services such as the schools and the surgery. I urge you to abandon the Plan forthwith.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPP16/12690 | Respondent: | 11034881 / Amy Carter | Agent: |
|------------|--------------|-------------|-----------------------|

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to you to protest about the plans for building on Green Belt sites in and around Send and Send Marsh.

I object to Send being removed from the Green Belt (Policy P2). The National Planning Policy Framework (point 80) states that one of the purposes of Green Belt land is `to prevent neighbouring towns merging into one another`. Send village and its surrounding Green Belt land acts as the necessary buffer between Guildford and Woking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Pressure on services

I work with parents in the antenatal and postnatal period and repeatedly see how overstretched the Maternity Services are in Guildford. I have also seen first-hand how long waiting lists are for hospital services such as the paediatric dietician. I do not believe that the Royal Surrey has the capacity to meet demand from the planned increase in housing and population, and certainly not within Maternity and Paediatric Services. Current and future residents will suffer from a lower quality of care and longer waiting times as a result of the planned expansion.

Schools are also already under pressure from an increase in the birth rate and have already been expanded (sometimes inappropriately I feel) to help cope with this. Despite the new schools planned, I worry that there will not be the capacity to absorb the number of children living in Guildford in the future with the proposed developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Transport

The transport infrastructure in Guildford is already stretched to its limits at peak times - the A3 and A31 in the area of Onslow Village, the hospital and the cathedral, in particular. The road network is simply at or beyond capacity and adding further traffic to the area would cause misery for commuters, local residents and emergency services alike. I actually find it incredible that anyone could have proposed the scale of development they have for the west of Guildford in light of its impact on the road network as must surely have been highlighted by any traffic assessments.

Locally to us, the infant school in Onslow Village is already subject to considerable road noise and pollution, which would worsen if the A3 was widened, which surely it would have to be to cope with any future expansion, let alone the amount proposed. Only a major project such as the A3 Guildford bypass tunnel project would be likely to have a significant impact. Additionally, the proposed junction for the Blackwell Farm development at the top of the Farnham Road is likely to make the roads busier and more dangerous in Onslow Village as vehicles seek to find alternative, clearer routes, magnifying the current issues that occur whenever there are problems on the A3 or A31.

Train transport is similarly at its limits in Guildford with commuter trains between Guildford and London some of the most overcrowded in the country – my husband is forced to stand or sit on the floor during his daily commute despite several trains an hour and an expensive season ticket. Any increase in capacity as a result of electrification of tracks or increased numbers of trains is needed just to deal with current problems. I am baffled as to how adding extra stations at ‘East’ and ‘West’ Guildford is supposed to help as surely the majority of those commuters would just be using the trains from there as a shuttle to the mainline station?

I do not believe that the proposed mitigating interventions do more than tinker at the edges, even if they were only to tackle the current issues, and are woefully inadequate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/12692  Respondent: 11034881 / Amy Carter  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Environment

I do not believe that the majority of residents would support expansion into (and the continuing shift of the boundaries of) the Green Belt, particularly not on this scale. The development seems to be 50-70% within the green belt - how can such an encroachment be morally acceptable to the council? This expansion will impact local wildlife, spoil views from the Hog’s Back and parts of the Downs, and have potentially dire effects on surface water flooding in Guildford due to loss of natural capacity for soak-away at a time when it is widely thought that our climate is becoming more unpredictable and extreme. Additionally, the new road for Blackwell Farm cuts through ancient woodland and the Surrey Hills AONB. The countryside surrounding Guildford is something we should be protecting for our children.

I also feel strongly that the council have been dishonest to repeatedly commit to protecting the Green Belt, or to promise countryside areas to the people of Guildford, and to then shift the boundaries or locations to suit its own aims; this has undermined my trust in the council, and in politics, generally. I fear even more for the protection of our countryside with the recent decision to leave the European Union.

There will also be impacts on visual amenity with the views from the Hog’s Back and North Downs blighted by huge numbers of buildings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12689  Respondent: 11034881 / Amy Carter  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing to object to the local plan on the basis that, despite the minor changes made, it still commits Guildford to development that I feel is inappropriate for the town and area, in scale and nature. I continue to object in particular to the planned large-scale expansion into the Green Belt at the Blackwell Farm site. Many of my points remain the same as I have not seen much in the amended plan to change my views.

Scale

The scale of development proposed in Guildford still seems completely out of proportion to the town. The proposed developments significantly increase the footprint of the town and encroach considerably into the countryside that helps make our town so special, materially changing Guildford for the worse for local people. It still makes no sense to me why our borough is proposing greater per annum building targets than areas such as Woking and Weybridge. I also believe that Housing ‘need’ continues to be subjective whatever ‘assessment’ you do – people ‘wanting’ to live somewhere is not the same as needing to, and building lots of housing attracts people, making the assessment a self-fulfilling prophecy. Furthermore, the recent decision to leave the EU and reduce immigration as a consequence, coupled with the projected reduction in economic growth reinforces the view that the population projections on which your assessments were based overstate the required level of development and need to be urgently reassessed.

Inappropriately overburdening some areas

Despite it stating in the local plan document that, ‘We have sought to select sites carefully and in a way which does not overburden any single area of our borough and ensure that the right infrastructure is in place’, this is clearly not true in the case of the Manor/Blackwell Farm development, which would be hugely overburdening the west of Guildford. This is especially true in light of the additional proposed development at the cathedral site.

Character

I believe that the large scale developments planned will materially damage the character of Guildford and make it a less desirable area to live in – after all the unique urban/rural character of Guildford is surely what drives the demand to live here – certainly it was for us. The approval of this scale of development would be enough to prompt us to consider moving elsewhere.

Plan

Finally, I want to draw attention to how inaccessible I found the consultation documents and the ‘presentation’ video on your website – I am educated to post-degree level and still struggled to follow what you were talking about at times. In addition, the sheer volume of paperwork that we have had to wade through to prepare an objection must be hugely off-putting to many people. I can’t help feeling that the council will be forcing the plan through and claiming reduced objections when this is not because less people object but rather as a result of people getting ‘objection-fatigue’ or being put off by the way the volume of information is being presented, where even the maps are very difficult to interpret, particularly on a computer screen where you are forced to zoom in and out repeatedly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/2121  **Respondent:** 11034881 / Amy Carter  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
I am writing to object to Guildford Borough Council’s changes to the draft Local Plan and in particular to object to the inclusion of Blackwell Farm (site/policy A26 para 4.1.9).

I do not believe that Blackwell Farm is a suitable site for all the reasons that I have listed in detail on the previous two consultations (!) but in reference to the latest document in particular…

- I do not believe that the result of the EU referendum, and resultant reduction in likely population increases, has been taken into account when projecting housing ‘need’.
- The inclusion of Blackwell Farm disregards independent expert advice on the landscape value of the area as a potential Area of Outstanding Natural Beauty (p1 para 4.3.8) and builds on a very significant amount of the valued Green Belt. It ignores government policy on protection of these areas (NPPF, para 115+116) and fails to include cost and scope of development elsewhere (s2, para 4.1.9).
- I live in Onslow Village and we already suffer on a daily basis from the area being used as a rat-run for vehicles trying to avoid the traffic on the A3 and A31 with severe issues on the A3 in particular a very regular problem. If this development goes ahead, this will inevitably worsen and other villages such as Compton and Puttenham will be drawn in too. Congestion in our area is already awful during peak times – this too will worsen, particularly as the intended development includes yet more office space close to an existing busy business park (E4 (2)). Indeed, expert traffic studies, which the council has access to, question the viability of the development at all (2.14a). Access to the Royal Surrey A and E is already very challenging and an increase in traffic will put lives at risk.
- Pollution is also a big issue – the levels in our area already consistently exceed safe EU limits on pollution – the building work, the finished housing development and the resultant traffic increases will all further worsen pollution locally, affecting our health and that of the other families in our areas and neighbouring areas and villages (A26 key considerations (7)).

Please reconsider the use of Blackwell Farm on this scale – it is not appropriate and will have a hugely negative impact on our town and countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Development of Wisley Airfield on the basis of:

Volume of houses and their occupants - This is a whole new town

According to the Census of 2011, both Horsleys have a combined population of 5,118. 2,000 new houses would have a population, given some single person accommodation and some families of at least 5,000 people. This would swamp the surrounding villages, their roads, health services and schools.

Transport. Our local roads are already overcrowded. The M25 is regularly gridlocked and access to the A3 on a ‘consented direct access’ can only increase the congestion. If each household has just one extra car, this will be an additional 2,000 cars. It is more likely that each family will have more than one car especially since the nearest railway station is only reachable by bicycle or bus rather than on foot.

Increased Air Pollution. Resulting from more vehicles in the long term and many HGVs during construction of the site.

If you require further proof, take the A429 past Jennett’s Park in Bracknell, 1500 houses planned. First opened in 2009/2010, still looks like a raw building site. We do not need 2,000 new houses at Wisley Airfield.

WRONG PROJECT IN THE WRONG PLACE.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9913  Respondent: 11034913 / Alison Hutton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the volume of houses proposed in the Borough to be built on land currently in the Green Belt.

1. Specifically that 65% of the new housing would be built on land at present in the Green Belt
2. Both Horsleys should remain in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1812  Respondent: 11034913 / Alison Hutton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposals for over 2000 houses at Wisley.

The existing levels of pollution and traffic congestion will not be solved by adding 2,000 homes and association development to this area. It is too too large for the area given its proximity to already congested roads and too large to be accommodated within the Community. There will be a total gridlock of traffic. Furthermore 2,000 houses will never be absorbed into the existing small villages in this area.

Several applications for this development have been turned down but the GBC Executive refuses to listen to any objection and seems determined to go ahead with this development, even after all the Councillors rejected the last application. The site was returned to the Draft Local Plan within days of this decision. Five storey flats would be an eyesore from all points of the Downs. The site is very visible as it is on a dome of land. At present, the airstrip, which should have been removed after its war-time requisitioning, is not visible among the green fields.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6967  Respondent: 11035361 / Marion Shipman  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is brown field land available in the Guildford town centre which is being earmarked for commercial development rather than housing. This is more than enough to meet the housing needs by using this area. This is despite the evidence that shopping trends are moving online and retail is a declining industry. There is no reliable evidence that Town Centre can support expansion of 45,000 sq m of additional retail space in North Street. As shopping trends change to move online, retail is declining. The space should be used for housing and the money should be used to improve transport and other infrastructure

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6965  Respondent: 11035361 / Marion Shipman  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

the policy says that provision will be made for 13,860 new homes. However, I believe the need for this number is based on flawed assumptions and assessment of future needs in housing. The number of new houses proposed have been generated from a Strategic Housing Market Assessment mathematical model, which was not revealed in the plan. This housing target has then been increased further by Guildford Borough Council to give a population increase almost 70% higher than the official national estimates for population growth in the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy 11 states infrastructure will be secured by planning obligation, planning condition, or from other infrastructure funding, including the Community infrastructure Levy.

However, there is a completely inadequate plan for addressing the infrastructure issues I have highlighted above. Roads around Ockham Road North and East and West Horsley are already busy and narrow and could not accommodate further traffic without, in addition to pollution issues, impact on vehicle and pedestrian safety. Relevant proposed road improvements focus on the A3 and £1 million for ‘East Horsley and West Horsley traffic management and environmental improvement scheme between 2019 and 2023’. With the number of houses proposed above but additionally the developments in Wisley and Clandon, this is clearly completely inadequate and too late.

As a health professional, the proposed expansion of Horsley Health Centre in 5-15 years is not acceptable. The number of GPs are reducing with retirements and there is no identified funding for such expansion. What provision will be made at the outset of building developments?

There are no proposals for how increased pressure on mains water, waste water, education and potential flooding will be met in the Horsley area.

In summary, I object to the plan for the reasons set out above, in particular to the proposed developments in East and West Horsley but also noting the extensive development nearby in Wisley and Clandon which doesn’t adequately consider infrastructure issues. I must ask you to amend the Local Plan to utilise brownfield land rather than green field sites.

Finally, I also note that the plan is very similar to that proposed in 2014 and ignores most of the comments received from the consultation at that time, most of which objections to the proposals. I trust the Council will listen this time.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Neither the policy nor the supporting Green Belt papers give any coherent justification for the proposed changes to the Green Belt. Indeed, policy H2 refers frequently to the quality of the countryside within the Borough. There are five legal purposes for Green Belt and our Green Belt meets them all. There are no exceptional circumstances that justify building the majority of the proposed new houses on Green Belt land or for insetting villages from the Green Belt. Green Belt preserves air quality and prevents flooding. The legal purposes for the Green Belt include:

- To check the unrestricted sprawl of large built up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. Unmet housing need is not an exceptional circumstance in law. The Plan has failed to disclose any exceptional circumstances to support such a change in boundaries and Green Belt boundaries should not be changed through the planning process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Policy S1 Presumption in favour of sustainable development objection

The Local Plan doesn’t demonstrate that this policy is met. The 385 + houses proposed in West Horsley accounts for an increase of 35% on the current number of homes in this area alone. In addition, 100 homes are proposed on a site in East Horsley near to the Station, adjacent to the West Horsley parish boundary. This is not in keeping with the number and density of housing in the local area. This equates conservatively to 1,000 additional people with no consideration of infrastructure and consequent environmental impact. The local schools are already full. Medical facilities are stretched, drainage inadequate, road infrastructure is narrow and poor, and parking difficult. Building this number of homes will lead to flood risk here and further downstream.

The developments should be in urban areas where there is sustainable transport and where the infrastructure issues highlighted above can be addressed. The already stretched train system in Horsley is not set up to cope with the additional commuters and car parking is already fully used.

In addition, developments at Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so every adult will have a car, putting additional pressure on the rail system.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I writing to object to the 2016 Regulation 19 Draft Local Plan. I find the plan has not addressed my concerns regarding infrastructure capacity such as traffic on the A247 and pressure on the Villages medical centre. I re-send with this letter my original objection to the 2014 consultation.

I object to building 485 homes in Send Parish and the scale of development proposed for Send. I object to sites A42, A44 and A43 and building 400 houses at Garlicks Arch.

The population will increase by more than 25% leading to congestion on roads and pressure on the medical centre.

I object to A43a and building a new on/off slip road to the A3 at Burnt Common as it will increase traffic and air pollution along on main A247.

I object to removing the Send Lakes from SNCl status. Bats, Herons, Kingfishers and Hedgehogs are all part of the wildlife that can been seen in and around the lakes. The local plan should encourage through policies preserving SNCl status as a part of the local plan’s environmental sustainability. It should not be removing it.

I object to removing Send from the Green Belt. Keeping Send in the Green Belt is an important buffer between Woking and Guildford to preventing the two settlements merging.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also reiterate my objection in 2016 to A43, Land at Garlick's Arch that this is overdevelopment and the local infrastructure will not cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2915   Respondent: 11035809 / Trevor Osborn   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 Land at Burnt Common allocation for a minimum of 7,000 square meters of industrial warehousing. This will increase traffic and pollution on the A247.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1328   Respondent: 11035809 / Trevor Osborn   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Green Belt Policy P2 at paragraph 43.15 to inset Send Business park from the Green Belt. This will increase traffic and pollution on the A247.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5113   Respondent: 11035873 / Alison Johnson   Agent:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Attached documents:**

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**Comment ID:** SQLP16/623  **Respondent:** 11035937 / Giles Reid  **Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

*The number of houses planned has risen to 693 houses per year over the next 20 years (compared with 652 per year in the 2014 Draft) and is more than double the 322 houses per year that was approved in the 2003 Local Plan.*

- 65% of new houses in the Borough are to be built on land that is currently in the Green Belt.
- Section 150 of the Housing and Planning Act 2016 states that a site, once identified in a Local Plan, is assumed to have permission to go ahead in principle, which means normal planning restrictions may be difficult to impose later.
- Little notice has been taken of the comments received after the last round of consultation.

**Traffic and parking:** Assuming that every new house has at least 2 cars, this means potentially 6,000 more cars within a three mile radius of the villages. The impact on local roads will be tremendous. Parking at Horsley & Effingham junction stations (which are already full), at the shops, at the medical centre and at the village hall will all be affected.
Local Road Network: In respect of the proposals for development at Wisley Airfield and for an upgrade the current A3 junction at Burntcommon to a full 4-way junction, SCC traffic modelling anticipates increased use of Guilleshall Lane, Hungry Hill Lane and Tithebarns Lane for traffic accessing the A3 at Burntcommon in order to travel to Guildford and beyond. The SCC report states that “consequently, it indicates that further thought may have to be given to managing traffic in this area as part of a transport assessment should the development be progressed”. It appears that the Plan is proposing a strategic site at Wisley Airfield without even knowing what improvements to the local road infrastructure will be required. If that is the case for Wisley Airfield, then it is almost inevitably true for the proposed developments in East and West Horsley as well.

Pollution: The large increase in volume of traffic will cause an increase in nitrogen dioxide and particulates in the environment – already a cause for concern in several areas in the Borough.

Flooding: The site behind Ockham Road North in East Horsley is partially a level 3 flood risk area, and local residents are well aware of how much standing water there is in their gardens after rain. Building on such land will only exacerbate the problem. We already know what happens to local roads when it rains – the drains can’t cope.

Schools: Local schools are already at capacity – where will newcomers go to school? No extra places are planned in the Horsleys, and the school places proposed at Wisley Airfield will not planned until many years into the project.

Medical facilities: Similar situation to the schools.

Loss of Green Belt land: Sadiq Khan, new Mayor of London, has instructed London planners not to approve development on Green Belt Land within the M25. If we continue to build on our countryside it won’t be many decades before we have none left. Creeping development has led to almost continuous housing from Central London to Effingham. Is this to carry on to Guildford and beyond? (1,700 houses are planned for the Guildford end of the Hogs Back and 1,000 new houses on greenfield sites in Normandy.)

Transport: Misery for commuters, nowhere to park and full trains at commuting times

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/284  Respondent: 11035937 / Giles Reid  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send Marsh/ Burnt Common

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not believe that Guildford Borough Council are taking into account the green belt when establishing housing targets. Guildford is a highly sought after area in a large part due to the mix of housing and green belt. The Council (and in particular the Councillors that have been elected by the electorate) has a moral duty to maintain the green belt to avoid establishing a precedent that destroys Guildford for future generations. The Council must not remove areas from the Green Belt, and I cannot see that this is direction being provided by central government to local government so the onus is on my local Councillors. I have lived in East Horsley all my life, and I am delighted to bring up my children in East Horsley. I fear gravely that the actions of the Council in regard to development will lead to making areas such as Horsley not as attractive for them to live and bring up their children. I believe that East Horsley must not be inset from the Green Belt. I
strongly object to the movement of the settlement boundary proposed under Amendment 4 in Appendix H map of East Horsley (South), proposed as part of Policy P2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Having read the revisions to the local plan I am writing to strongly object to the local plan as it currently stands. Whilst I recognise that there are improvements such as stopping the development of the Thatcher’s site, I am fundamentally opposed to any development of the green belt in the borough of Guildford or any proposal to inset East Horsley from the green belt.

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strongly object to the movement of the settlement boundary proposed under Amendment 4 in Appendix H map of East Horsley (South), proposed as part of Policy P2.

I understand the housing pressures and the need for the Council to provide affordable housing and lower cost housing, but I think Guildford borough has a unique challenge. Given the desirability of the area, the development of areas such as East Horsley will lead to additional supply but this won’t be affordable housing for most. Guildford is an expensive area and this challenge remains. I believe that Guildford needs to revise the number of dwellings proposed at Wisley airfield. The infrastructure (doctors; trains; parking; roads) cannot cope and no adequate solutions are proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
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Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
  2. The increased volume of car traffic proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
  3. The congestion of this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
  6. The lack of suitable public The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.
- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will...
exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.
- I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.
- Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will mean either major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.
- Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We are calling on the Council to respect the nature and character of our villages and impose a maximum development target of 20% housing every four years (of the total number of houses envisioned in the Local Plan).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17718  Respondent: 11036129 / George Dokimakis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

We are calling on the Council to increase the land allocated for offices and manufacturing. We envision Guildford Borough to be a city in its own right and go beyond the commuter town envisaged by the current Executive Committee.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17716  Respondent: 11036129 / George Dokimakis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

A lot of work has gone into the Local Plan. It is obvious for anyone who has read through the Local Plan that the Guildford Borough Council’s civil servants have done an excellent job with the brief that were given. Unfortunately the brief does not address the borough’s needs adequately.

The situation we find ourselves in and in need to remediate is the result of the short-sighted 13 years of Conservative leadership of the GBC. We are in need of housing, both social as well as for the professionals in low to average income jobs that support Guildford’s borough; nurses, police officers, retail workers, bus drivers and a raft of other professionals.
struggle to find affordable accommodation within Guildford. This results in most of them living outside Guildford and commuting into town, resulting in part in the traffic gridlock most of us experience on a daily basis trying to traverse the city centre. The policies put forward by the GBC do not address the needs of our Borough.

We are calling on the Council to evaluate high-rise, high-density buildings within the centre of Guildford before allowing development in the villages and in the Green Belt. Woking is a good example where multi-story buildings blend in to the city’s life and provide a young and vibrant population.

We are calling on the Council to provide innovative housing accommodation for our young professionals such as purpose-built Multiple Occupancy Houses. Where the Local Plan identifies such accommodation may be created, we ask the council to use the Council’s building company to provide such accommodation for our residents.

We are calling on the Council to provide social housing that addresses our current needs instead of mandating a 40% quota of affordable housing which may well not suffice. The “affordable” housing proposed by the Local Plan is not affordable for most of our residents.

We are calling on the Council to provide accommodation suitable for our ageing population also and include policies that protect the existing bungalows used by our older residents.

We are calling on the Council to ensure decent living standards for everyone by mandating that the 12 Building for Life principles apply to every housing development and only by exception allow developments not to meet these standards.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17725  Respondent: 11036129 / George Dokimakis  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

No development can be sustainable without the right infrastructure supporting it. In this we support the Council in ensuring that infrastructure is created alongside or before any development. We are also calling for innovative approaches to providing the required infrastructure such as working with existing GP services to expand current premises or create additional GP branches to support the increased development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17720  Respondent: 11036129 / George Dokimakis  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
We are calling on the Council to put forward a travelling and commuting scheme that encourages and promotes the use of public transport over car usage. We are calling for the areas to be pedestrianised and for more cycling lanes.

We support the Council’s plans to redevelop the bus station and make it a station our residents can be proud of.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17719  Respondent: 11036129 / George Dokimakis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

We strongly support the protection of all Areas of Outstanding Natural Beauty and oppose any changes and development that may erode the character of AONB.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17722  Respondent: 11036129 / George Dokimakis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

We are calling on the Council to include the development of the River Wey to the Local Plan and ensure a holistic development for our riverfront and town centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: SQLP16/521  Respondent: 11036129 / George Dokimakis  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I am putting all the comments here as they apply to a number of sections and the method of providing feedback is slightly ludicrous and geared towards making it difficult to provide comments.

Overall a good starter plan but it doesn't go far enough or is sound enough. Unfortunately the plan does not address the borough’s needs.

We are in need of housing both social as well as for the professionals in low to average income jobs that support Guildford Borough’s. Nurses, police offices, retail workers, bus drivers and a raft of other professionals struggle to find affordable accommodation within Guildford. This results in most of them leaving outside Guildford and commuting into town resulting in part to the traffic gridlock most of us experience on a daily basis trying to traverse the city centre. The policies put forward by the GBC do not address the needs of our Borough.

You need evaluate high-rise, high-density buildings within the centre of Guildford before allowing development in the villages and in the Green Belt. Woking is a good example where multi-story buildings blend in to the city’s life and provide a young and vibrant population. such an approach would make the town more vibrant and provide the much needed accommodation.

You should use the council-owned building company to provide innovative housing accommodation your young professionals such as Multiple Occupancy Houses.

You need to ensure that social housing is provided that addresses our current needs instead of mandating a 40% quota of affordable housing. The “affordable” housing proposed by the Local Plan is not affordable for most of our residents and is a ridiculous measure to use.

You need to consider the aging population and provide accommodation suitable for our aging population and include policies that protect the existing bungalows used by our older residents.

You should mandate that the 12 Building for Life principles apply to every housing development and only by exception allow developments to not meet these standards.

We need to respect the nature and character of our villages and impose a maximum development target of 20% housing every four years (of the total number of houses envisioned in the Local Plan).

We need to increase the land allocated for offices and manufacturing. We envision Guildford Borough to be a city in its own right and go beyond the commuter town envisaged by the current Executive Committee.

I strongly support the protection of all Areas of Outstanding Natural Beauty and I am glad this is in the plan.

The infrastructure model needs improvement. You need to put forward a travelling and commuting scheme that encourages and promotes the use of public transport over car usage. more areas to be pedestrianised and for more cycling lanes.

I support to plan to redevelop the bus station and make it a station our residents can be proud of.

The development of of River Wey should be included to the Local Plan and ensure a holistic development for our riverfront and town centre.
More innovative approaches should be undertaken to providing the required infrastructure such as working with existing GP services to expand current premises or create additional GP branches to support the increased development.

Finally, I ask you to be transparent and provide a full and detailed analysis of our development SHMA targets. The development of the GBC is integral to this Borough’s future and our residents will support such development where transparency exists and all other options have been considered and exhausted. Currently this is not the case. be transparent in everything

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2173  Respondent: 11036129 / George Dokimakis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- In terms of policy D1 The monitoring indicators of the same policy do not state what level success looks like. Very vague. 100% should be built for the quality mark.
- Policy D1 Design places, point 2 “should” go back to “must”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2174  Respondent: 11036129 / George Dokimakis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy D2 point 9 commendable increase. New developments should also include charging points for electric vehicles. we should be planning for the future.

4.5.16a about sustainable development should say appropriate to the development instead of proportionate

4.5.30 retails buildings should not be exempt from the carbon reduction. All measures apply equally across the board. No distinctions should be made between housing and retail.

4.5.37a should be removed
4.5.30a allows for a way out of meeting carbon emission needs. It should be removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2175  Respondent: 11036129 / George Dokimakis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- Policy D4 About Character and Design of new developments, Building for life should be made mandatory

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2166  Respondent: 11036129 / George Dokimakis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- Social housing needs to be mandated as part of the H1 policy. Social Housing should not segregated from other developments. Mixed development has numerous benefits and should be supported by GBC.
- Affordable housing includes social housing but makes no distinction of percentages. 40% affordable housing is mandated and at least 20% of it should be social housing as a minimum.
- Great about student accommodation. The key thing is that student accommodation needs to be expanded beyond the University of Surrey to include other academic institutions such as Merrist-Wood College, ACM, Drama School and the University of Law.
- Overall the Local Plan should be considering house density, not number of houses. Look at how many people live there, not how many houses we build.
- All houses built should be of a good standard. The Local Plan should mandate Build for Life standard for all houses.
- All measures for carbon reduction must apply equally across the board. No distinctions should be made between housing and retail.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>- Policy H2 should change back to mandating social housing. Point 4 of it should be removed.</td>
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<td>- 4.2.40 should be re-instated. Community benefits are not an excuse to avoid affordable housing.</td>
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<td>- The validity argument is too weak and vague. It needs to be strengthened including a better definition of what is economically viable.</td>
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<td>- Public transport and community transport should be central to the Local Plan to alleviate congestion pressure.</td>
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- Policy ID1.1 good point, fully support it. Including point 3.
- 4.6.29 should look at the enforcement as well as the submission of Transport Assessments and Travel plans by developers
- 4.6.30 should be reinstated like slyfield estate and make it stronger “…including parking for local residents” or “Travel Plans will be required on industrial estates or business parks in order to coordinate parking and transport needs for employees with the needs of surrounding residential areas.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12684  Respondent: 11036193 / Wayne Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

° I support the Guildford Residents Association (GRA) response to the proposed Local Plan and totally oppose Guildford expanding by a quarter.

I also feel that in light of BREXIT the data that the Plan is supposed to be based on regarding population and housing need is now invalid and must be reassessed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/520  Respondent: 11036193 / Wayne Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The infrastructure cannot cope with the existing population, never mind one expanded by 20-25%.

Roads are already congested and frequently grid-locked during commute and school times. The merest accident on the A3 grid-locks the town centre due to traffic avoidance.

Sort out the infrastructure first, then consider housing expansion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

If the Council fails to protect the Green Belt and constrain expansion to reflect the widespread concerns of residents regarding environmental and transport issues, the 2017 Plan will irreparably damage the very qualities that make Guildford an attractive place to live and to conduct business in.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In view of flawed new evidence, Guildford’s proposal for more than 12,426 homes (plus a buffer of 1,155 homes) is excessive and will result in needless loss of Green Belt and green character, and increased congestion, that cannot be justified in our heavily constrained borough.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPS16/1882</th>
<th>Respondent: 11036289 / Osman Abdullah</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A26</td>
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I OBJECT to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views from the Hog’s Back ridge - a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6698  Respondent: 11036289 / Osman Abdullah  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A26 Blackwell Farm. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of green belt, and fulfils purposes 1, 3 and 5 very strongly. Purpose 1 - “checking the unrestricted sprawl of large built-up areas”. There is huge pressure to develop on the western edge of Guildford; the University of Surrey has stated publicly that its key objective is to develop the whole of its landholdings, stretching west to Flexford Farm. This, combined with the indefensible boundary being proposed (a hedgerow rather than the existing belt of ancient woodland), will put more of the green belt and the Surrey Hills Area of Outstanding Natural Beauty (AONB) at risk of future development. Purpose 3 “assists in safeguarding the countryside from encroachment” - the proposed movement of the green belt boundary on the west of Guildford to allow for development of the University in 2004 resulted in the encroachment on countryside and the loss of working farmland (including some Grade 2) at Manor Farm. The proposed future change in the boundary would result in further encroachment and the loss of farmland including further Grade 2. The proposed road development with access road from the A31 would also effectively cut off farm access to the south of the development area leading to further urban influence on this countryside. The University’s stated key objective is to develop land, which includes Chalkpit and Wildfield farms leading to the risk of further boundary change and further encroachment in future years. Purpose 5 - “assists in urban regeneration by encouraging the recycling of derelict and other urban land” Whilst all green belt assists towards this purpose, the ownership of this land by the University of Surrey with its extensive landholdings within the urban boundary (including land it leases to the Hospital and Holiday Inn, the Surrey Research Park, Hazel Farm as well as two large campuses) means that the location of Blackwell Farm within the green belt plays an even greater and direct role in encouraging the more efficient usage of urban land. Stopping development on Blackwell Farm would result in the University of Surrey investing in, and regenerating, land in its ownership and delivering its commitments following the 2003 boundary review (including 270 homes for key workers, 3,125 student residences and releasing further accommodation at Hazel Farm). The University has
17 hectares of surface car parking that could be built over with offices and flats. This is a more sustainable option than building over open farmland (largely grade 2 and 3a) within the green belt. The Blackwell Farm development would result in harm to the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the setting to the AONB. (Blackwell Farm forms the views into and out of the Hogs Back ridge). The NPPF is clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. All development proposals within and adjacent to the AONB must conserve or enhance its special qualities. The NPPF also makes it clear that applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public’s interest. Guildford Borough Council has not shown that the proposed housing development or the extension of the Research Park, or the proposed link road from the A31 to Gill Avenue, is in the wider public interest. Indeed, the increased traffic through the already congested Egerton Road/Gill Avenue junction, which would result from the development, would impede emergency vehicles travelling to the Hospital and this would be very much against public interest. GBC’s Policy P1 states that, “The Surrey Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development. All proposals will be considered against whether they conserve and/or enhance the setting and views of the AONB”. I question how the proposal to carve a new two-lane carriageway through the AONB fits this policy, or meets para 115 of the NPPF? Finally, nearly the whole site has been identified as a “candidate area” for AONB status in the Landscape Evaluation Study commissioned by Compton, Worplesdon and Wanborough parish councils. Therefore, the entire site should be treated as though it is within the AONB during this local planning process. The access to the proposed Blackwell Farm site will put additional peak hour pressure on two of Guildford’s worst congestion “hot spots”: the A31 (Hog’s Back) and the Tesco Roundabout on Gill Avenue. GBC’s proposal to create a new major route into Guildford from the west at, or close to, the Down Place private driveway, and to make this the main access to the planned Blackwell Farm development, does not appear to have been thought through. There are queues stretching back from the Farnham Road Bridge as far as the Down Place driveway entrance most weekday mornings and any traffic generated by the new development would not be able to clear the junction. In order to accommodate the volume of traffic using the new junction (generated by residents of the new housing estate, employees at the Surrey Research Park, Hospital and University, and visitors to the new school/supermarket), there would almost certainly need to be a roundabout (rather than the proposed traffic-light controlled junction) and GBC has ruled out a roundabout on grounds of landscape impact and traffic. The secondary access to the site at Gill Avenue also presents problems, and as GBC states in its Transport Assessment (14.9.5), changes planned for the Tesco roundabout will not mitigate against the increased level of traffic through the junction as a result of the Blackwell Farm development, and in turn will impact on the Egerton Road/Gill Avenue junction, which serves the Royal Surrey County Hospital. I question whether it is responsible to allow a development that would impede emergency access to an A&E department and a major incident unit. The traffic impact resulting from the development of Blackwell Farm on the strategic road network would not appear to be properly assessed but it would be alleviated in part (but not completely) by widening the A3. However, timing and funding for this work is unclear so there would be many years of traffic chaos before any widening took place (if indeed it does). More significantly, the widening of the A3 would create noise and environmental impact on the neighbouring residential areas of Onslow Village and Beechcroft Drive and a six-lane highway would cause greater severance between Guildford and Blackwell Farm and areas to the west. The NPPF states in Section 6 para 47 that local authorities should “identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15”. In a footnote to this, it further adds, “To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.” I consider that the proposed access arrangements to Blackwell Farm are wholly inadequate for a development of this scale and thus the site cannot be “viably developed”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6699  Respondent: 11036289 / Osman Abdullah  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A55

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of land from Greenbelt for the provision of two traveler pitches on Puttenham Heath Road to 'enable delivery'. The area warrants Green belt status and should remain in Green Belt. Removal is a big step towards the eventual development of permanent accommodation, which would result in loss of the two pitches.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14145  Respondent: 11036289 / Osman Abdullah  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy D1 Making better places  I object to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force. The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14147  Respondent: 11036289 / Osman Abdullah  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy D2 Sustainable design, construction and energy  Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1, not buried away as a minor detail in Policy D2. This policy amounts to “greenwashing”, expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light
pollution. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital, especially the countryside, from attempts to rig the housing market. This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is difficult to understand, since no such networks are available locally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy D3 Historic Environment This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to “support development” that might “enhance” heritage assets leaves wide scope for abuse in the form of destructive commercialisation and financial leveraging of relevant sites. This policy is based on the false premise that Guildford’s heritage is inherently in decay. This is a developer’s charter – a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council’s reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the “reasoned justification”, the actual policy wording in the blue box leaves too many loopholes. Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy D4 Development in urban areas and inset villages This policy that does not address the opportunity for building in the urban area The plan envisages that 40% of homes built will be “affordable”, but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called “affordable” homes or pay an “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand). The number of homes planned in the urban area is much too
low. There is a glaring need for regeneration in many urban areas, particularly Guildford Town Centre but this is ignored in favour of building homes on green-field sites instead. This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure. The plan envisages a large expansion of the retail sector, but this is hard to justify because the sector is in rapid and continuous decline. THE BROWNFIELD OPPORTUNITY Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. But first we must make good use of our urban brownfield before we consider building in the Green Belt or countryside. Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy that states clearly. “We are committed to a brownfield first initiative whereby all applications on previously developed land are given fast track priority and every facility to promote development for residential purposes and employment purposes in order to satisfy the needs of local people. In parallel a low CIL incentive should be given for all residential development on brownfield land.In response to the detailed objections received in the Regulation 18 process of the 2014 Local Plan and also in accordance with government policy a Guildford brownfield land register should be urgently compiled showing address, ownership, occupier, current use and detailed planning brief.Perhaps someone could be appointed at GBC with a clear briefing to deliver brownfield targets of housing and employment spaceGBC needs to accelerate the residential redevelopment at Woodbridge Meadows, Walnut Tree Close and the Station within the next 5 yearsGBC needs to examine the residential development opportunity of the 25.7 acres of car parks in GBC ownershipI do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. The Town Centre policy needs to maximise the potential for residential development on brownfield and include an as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. The reality is that the Town Centre has the capacity for significantly more homes. See details on GGG website - Guildford Greenbelt Group

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14130  Respondent: 11036289 / Osman Abdullah  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy E1 sustainable employment I note that there is a significant reduction of between 71% and 79% in the previous job target and resultant 79% reduction in employment space in response to the many objections lodged in 2014 against an unsubstantiated agenda for economic expansion in the last draft and based on new findings by Aecom in the latest ELNA 2015.I have concern as to the ill-informed clustering of all B classes in terms of the clarity of market evidence required to inform effective planning and a failure to provide a clear understanding of business needs required under Section 160 of the NPPF. I also note the dramatic reduction in assessed demand by two Employment Land Needs Assessment Reports carried out under the same terms of reference within a period of 2 years which calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC. I am concerned however that the research undertaken by Aecom is generally superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space. No proper analysis has been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and...
no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area. GBC appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of useful property market research or forward planning. What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8. The lack of appreciation as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below). Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan. Little regard is given to the opportunity of B1b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub. I note that the past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 derived from VOA analysis and that the calculated annual floor space demand is 0.7% over the plan period up to 2033. I support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires. We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So I should target high added value small and medium sized enterprises rather than the headquarters of larger corporations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14132  Respondent: 11036289 / Osman Abdullah  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy E2 location for new employment floor space I object to the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt. The Surrey Research Park currently extends to 65,000 sq m. There is already granted consent to expand to a further 9,000 sq m (14%) The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VOA analysis. The ELNA 2015 calculated annual floor space demand is 0.7%. The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period. The necessary growth in floor space over the plan period is therefore 17 years x 0.7% = 11.9%. There is currently 14% expansion space already available. The proposal by GBC to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required. The Research Park is currently developed at a density of 25% plot ratio. The majority of existing buildings are 2 stories giving a developed floor space plot ratio of 12.5%. The existing Research Park has the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing densities of existing academic buildings on the university campus which are three to four times higher. Together with the existing expansion of 14% through existing consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university. A preferred location for increased B1a and B1b space would be in the Town Centre close to housing and a convenient transport hub.
I object to Policy E3 maintaining employment capacity I object to the ill-informed policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land. It is also contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential). I believe that the existing government policy which has recently been made permanent of allowing change of use from B1a to C3 is sound. Many office buildings reaching an age of more than 30/50 years become redundant in terms of energy compliance making them illegal to occupy for employment purposes and the cost of refurbishment makes them redundant and uneconomic. The reality of market demand is that the gross development value of refurbished residential space is in excess of the gross development value of refurbished old office space in many locations (this gross development value assessment is supported by the analysis by property consultants GVA in the supporting evidence within the Allies and Morrison Masterplan for Guildford dated 2015). To resist change from B1a to C3 is contrary to the concept of brownfield first for residential development schemes. To resist change from B1a to C3 in Strategic or Significant Employment Sites is contrary to the concept of integrated mixed use communities whereby the journey to work is minimised. London has led the way with significant residential schemes being created from redundant office stock. A good example is the South Bank in London adjacent to Waterloo Station where in 2005 the Shell Centre has been converted into flats. Another early example is the 2000 scheme at Metro Central Heights at Elephant and Castle where the old Alexander Fleming House was converted to 435 flats by St George. GBC needs to adopt more modern trends and policies.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to policy E4 Surrey research Park. I support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. I object however to the completely unnecessary expansion of the Research Park into a larger Business Park. I believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University. I believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. I object to the inclusion of B1c uses which is inappropriate and unnecessary. Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise. There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user Research parks that lose their way stop being the location of choice for new innovative enterprises. I hope the Surrey Research Park in Guildford remains focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing. Monitoring indicators should include new start-ups and new patents created. Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments. Support the idea of a variety of sizes of unit including some small units (between 15 – 80 sq m) bearing in mind one workstation is 10 sq m. Consideration should be given to the concept of shared “enterprise hubs” where individuals can take pay as you go workstations in shared spaces similar to touch down business centres similar to the “enterprise village” concept object to the policy of any new extension of the research park more than the existing 14% already provided for within the park or within the footprint of the park. The Surrey Research Park currently extends to 65,000 sq m. There is already granted consent to expand to a further 9,000 sq m (14%). This space has been available for 10 years and is still to find a taker. The trend of expansion of Office/R & D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VOA analysis. The ELNA 2015 calculated annual floor space demand is 0.7%. The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period. The necessary growth in floor space over the plan period is therefore 17 years x 0.7 = 12% which is less than the current expansion space of 14%. The research park is developed at a plot ratio of 25%. This could be increased to 50% within the same footprint of the existing park without damage to its amenity. The actual current land use for development in the park is in fact only 12.5% because most buildings are 2-storey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/14140</th>
<th>Respondent: 11036289 / Osman Abdullah</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy E5 Rural Economy. In my opinion this policy should only apply to small-scale development in rural areas which means development of less than 100 sq m (gross) which is in keeping with and the permanence and amenity of the green belt. Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism that require local people to be consulted and heeded, not ignored. Villages need protecting in terms of both design and scale and character. Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This disregards the responses from the 2014 public consultation.
The consultation process was not well publicized; many Parish Councils had no idea of this. The emphasis on voluntary efforts and greater community efforts is far removed from reality for this 'solution' was presented for almost every aspect of rural life from managing crime to looking after elderly to education and more besides. Villages by nature are usually small and the percentage of the population who are able to do voluntary work is smaller still. The solution is therefore unworkable. The results of the consultation were not publicized but were instead collated and summarized and bore no resemblance to the submissions I had sight of.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLP16/14143  Respondent: 11036289 / Osman Abdullah  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy E6 the leisure and visitor experience. I believe that the importance of a visitor attraction hub could be much better articulated. Guildford has great potential to become a “must see” destination for tourists and visitors. Surrounded by the natural beauty of the Surrey Hills, it is already distinguished as an historic county town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back.

The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town. Given the local and wider catchment of the town Guildford should strive for high quality definition making it a great centre for people to live in and visit. Guildford the historic “Gateway to the Surrey Hills” has far more potential than Guildford just any other stereotypical centre found anywhere around London. Re-branding walks, such as a new “Pilgrims Trail” similar to the Patriots trail in Boston USA with marked yellow footsteps leading from the station to the River and up through the historic heart of the town. There is a need to make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms. There is a need to help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to RHS Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently bypass Guildford to go to Bath, Oxford or Cambridge instead. THE TOWN CENTRE OPPORTUNITY I do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. What the town centre needs in terms of urban regeneration and to attain a thriving night time economy is more residential development. The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015. The reality is that the Town Centre and other areas of brownfield in the borough has the capacity to provide significantly more than this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I object to policy H1 Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions. The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated. I support higher density development but not high-rise development (i.e., over 10 floors) in the urban area close to transport hubs to facilitate modal shift e.g., 20 minutes’ walk of Guildford railway station. Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g., Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g., by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required above it, with parking beneath. Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.</td>
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| I object to policy H2 Affordable homes. “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people. In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit. I question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally in enormous debt (contradicting the Government’s policy of encouraging labour mobility and development in poorer regions, where homes are cheaper); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes will be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and by the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed in the plan might influence the market in a more remote part of the UK, but not here. This
policy’s version of “affordability” is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to policy H3 Rural Exception Homes This is a type of Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix”, this can include “market” housing – i.e. normal commercial development which in Guildford usually means expensive executive homes. This policy means building anywhere, and ignoring all historic planning restrictions. The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to policy H1 Infrastructure and delivery Most of the borough’s infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. Yet this plan’s commitment to building housing estates across the Guildford countryside will mean either major infrastructure investment that no-one is prepared to pay for or else a catastrophic and simultaneous collapse in transport, educational, medical, energy, water and communications services. The plan targets greenfield sites – requiring heavy infrastructure investment – in order to generate CIL income necessary to meet an infrastructure shortfall that is already serious. The current draft CIL scale also encourages development on greenfield sites rather than brownfield and will reduce or negate developer's obligation to sell a percentage of homes at 20% below market value. The policy wording says nothing about roads and traffic. The Council’s methodology for assessing infrastructure needs in this area is inadequate, identifying only the tip of an iceberg of existing congestion. Compton Village is already close to tipping point, yet it will see a significant increase in traffic volume, will be completely
congested and yet no plans exist to mitigate the problem. The schemes referred to in this policy barely solve existing congestion and are inadequate when development takes place. The full impact on local road networks has not been fully considered. Some proposed development locations would require highway schemes that involve demolishing property and road-widening in residential areas to solve the resultant congestion. The A3 improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place. These detailed investigations are being deferred until the planning application stage and will be left to developers to prepare. If a site then proves to be unsustainable its Green Belt protection will have been lost for no reason and unsuitable development will take place by a more insidious process. Compton Village will actually incur increased traffic flow as a consequence of A3 widening according to the study, yet as was pointed out above, no solutions are in place to improve the situation. Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritising greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognising this as a key issue, the plan makes too many assumptions, not least being the verbal promise that development will not take place without infrastructure preceeding it. It is not clear how this will happen and is not in the Plan, as it should be, if it is achievable. The highways network is under stress at peak times in many parts of the borough. Queuing is the daily experience of drivers going to and from work. The local plan recognises the problems in para 2.14. Much of the road network is single-carriageway, and junctions act as constraints. The key evidence on future traffic conditions is provided in the Strategic Highway Assessment Report (SHAR) which summarises the results of the tests carried out by Surrey County Council at the request of GBC. Five scenarios were examined using SCC’s strategic traffic model. Scenario 1 contains all developments and planning permissions from 2009 to date. As such it corresponds to today’s circumstances, and describes the current unsatisfactory traffic conditions in peak periods. Scenario 5 represents the position at the end of the plan period, including all development and highways schemes in the local plan. The results of the analysis show that there will be widespread congestion in the morning peak hour across the network. The key strategic routes, the A3 through Guildford NE bound, and the M25 between Junctions 10 and 11, are shown to be at or over capacity. The summary network statistics presented in the SHAR, while useful, require some interpretation because the analysis of vehicle-hours is derived from link speeds only, and does not reflect junction delays and queues. The tables that show the ratio of flow to capacity and level of service are especially helpful to gaining an understanding of the conditions on the network in the forecast. Where the forecast traffic volume is above or close to capacity, flow becomes unstable and there is congestion. The SHA results provide evidence that, in 2031, congestion will be worse than it is today on much of the network. It is the case that the traffic modelling does not take into account the potential for increased use of other modes, but the trip rates used for developments already have built in the typical level of use of other modes, and services will be required to meet that need. It is also the case that the model does not allow for park and ride, which would improve matters in the town centre, as discussed below. In order to gain an insight into conditions across the network, it is necessary to combine information from several tables in the SHAR. Table 4.5 shows that the M25 and A3 will be at capacity in Scenario 5. The other roads that will have poor levels of service include those in Table 4.5 but also those in 4.12 (except the A3) and those in Tables 4.3 and 4.4 with levels of service E and F that will not be given some relief by improvement of the A3 in Scenario 5. Paras 4.10.3, 4 and 5 point out that there will be increased congestion. Given that the starting point is unsatisfactory, there can be no expectation that the schemes in the Infrastructure Development Plan will provide an overall improvement. There will be some local benefits, such as the Ash rail bridge for example, but in general conditions will be as bad and in many places, such as Compton Village, worse. So the statement in the SHAR para 4.2.5 that ‘the combined mitigation as reflected in Scenario 5...indicates that at the strategic level it accommodates the additional PSLP demand’ needs qualifying – ‘at the cost of a lot of queuing’ and makes no mention of the impact this will have on pollution, which is already a known problem at the A3 end of Compton. The cumulative effect of the additional traffic generated by the developments in the local plan will be to increase congestion, even with the proposed highway schemes in place. More detailed analysis of the junctions and queuing is required. So we question the conclusion that the developments would have “an acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPFF” (para 3 of the Transport Topic Paper shows the phasing of housing development and transport infrastructure. The major scheme being considered for the A3 between the A31 and the A320 is scheduled for delivery in the period 2023/24 to 2027/28). The strategic developments at Blackwell Farm and Gosden Hill Farm are shown as being phased in from 2021/22 onwards. The Garlick’s Arch development is shown as starting in 2019/20. Therefore, there will be a period in which the existing A3 has to cope with the additional demand arising from those developments before extra capacity is provided. The following comments regarding the strategic sites are taken from the SHAR: Blackwell Farm – there will be congestion at the A31 junction, and the problems at the Tesco junction, and the Egerton road / Gill Avenue junction (para 4.9.5). Traffic is likely to access the Surrey research park and
the RSCH through the development (para 4.7.3) Gosden Hill Farm – there will be an increase in traffic through Burpham. There will be pressure on the A3100/B2234 roundabout (paras 4.7.6, 4.7.7 and 4.7.8). Wisley – traffic will increase on minor roads to gain access to the A3 (N and S bound) and other routes (para 4.7.11). The development will add more traffic to the A3. The Burnt Common slips help alleviate the traffic through Ripley according to the model, but queuing on the A3 could mean this does not happen (para 4.7.14). Normandy/Flexford – the report has little to say about the impact of this large development. The increase in flow on Westwood Road is noted (para 4.5.7). Tables 4.10 and 4.11 show junction delay reducing at the Westwood Land, B3000 junction, but an increasing at the Puttenham Hill/Millbrook junction. Ash – development in Ash is not specifically addressed, but there are major increases in traffic on a number of roads. The new rail bridge will bring relief (but traffic will move to the next junction). Slyfield – there are no remark relating to SARP, and as there are no additional trips shown in and out of the Slyfield residential zone in Tables 3.3 and 3.4, it is possible that this development has been omitted. There is a significant increase in trips to and from the Slyfield industrial zone, which will impact on the A320 and Clay Lane. Town Centre – the report has very little to say about the town centre. It is evident that the model is forecasting severe congestion on the approaches to the town centre, such as the A281, the A31 Farnham Road, and Woodbridge Road for example. No mitigation measures are planned. And in the Transport Strategy, GBC states that the intention is to adopt Allies & Morrison’s Scenario 2 which would have the effect of significantly reducing the capacity of the town centre road system. The implications have not been examined, but traffic using the A281 from Waverley, for example, would be affected.

The B3000 will be severely affected by development schemes and will not benefit from road improvements. It is essential that the impact of all change to road networks are looked at in conjunction with one another for any survey to be meaningful. The local plan does not state an objective for congestion. The two strategic objectives that are included for infrastructure refer to supporting sustainable development and delivering a balanced system. However, in para 2.15 there is an aspiration expressed about opportunities ‘to improve the performance of the road networks through transport infrastructure and service improvements’, which taken with the previous paragraph includes reducing congestion. The evidence so far shows that this will not happen. The mitigation proposed is not sufficient to overcome the problems that will be caused by the level of growth in the local plan. Congestion will worsen. The network will lack resilience and be vulnerable to disruption due to incidents. Minor roads will have to cope with a lot more traffic, for which they are unsuitable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14157 Respondent: 11036289 / Osman Abdullah Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy i2 Supporting the Department of Transport’s “Road Investment Strategy” This policy is too vague and unrealistically optimistic. Decisions by Highways England on improving the strategic road network (the M25 and A3) are still years off. The Council have suggested a very expensive tunnel under Guildford, but there is no evidence to show that this is a realistic option. Even if Highways England accepted this (which is highly unlikely in the post-Brexit public spending climate) it would not be built until the end of the plan period at the earliest. Other, less expensive A3 improvements, and changes to the Junction 10/Heathrow stretch of the M25, will also take years to agree and complete. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is foolhardy. Surrey is the most congested county in England, with 683 people per square kilometre, compared with an English average of 413. This policy will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new...
homes at Wisley Airfield alone). This is a major development constraint that should have been applied to the OAN to constrain the housing target.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/14160  Respondent: 11036289 / Osman Abdullah  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy I3 Sustainable transport for new developments This is another aspirational policy, not grounded in the practical realities of daily life. It consists of a standard, box-ticking list of local government measures unrelated to the specifics of the plan. Like infrastructure, transport appears to be an afterthought; the policy fails in its essential job of guiding planning decisions, since it assumes development of any kind can be supported by sustainable transport. The sustainability of the dormitory settlements which the Council want built across the countryside depends on a general “modal shift” from private car use to walking, cycling and public transport. This is unrealistic. The proposed sites are often miles away from the nearest railway station. Bus services even in the largest villages are almost non-existent – just one bus to and from Guildford each day in the Horsleys and none at weekends. Since bus services depend on profitability, they cannot be expanded and the Council are not proposing to subsidise new ones. Rural buses are too slow anyway for busy people. Most rural roads in the borough are narrow, winding, hilly, potholed, muddy and unlit. Many flood badly and have no footpaths. The desired modal shift would require a comprehensive co-ordination of bus and train timetables with services every few minutes, seven days a week, to stops within walking distance of every home in the borough. This kind of integrated public transport system has been achieved in Switzerland, for instance, but only at huge public cost and thanks to a political consensus supporting state ownership of trains, buses and the post office, which delivers rural passengers as well as mail. There is absolutely no chance of this in the UK. The vast majority of the borough’s residents are not, in practice, able to cycle. This includes children, the elderly, commuters who have to look smart, the infirm, the unfit and people carrying goods or shopping of any kind. Dependence on walking and cycling discriminates against these groups, which include some of the most vulnerable members of the community. It is socially unjust. One in two working people in Guildford commute for up to 3 hours a day. They will not leave their cars for even part of their journey if it means longer travel times. Park-and-rides are a welcome part of the transport mix but are too slow for commuters and others on a tight schedule. For an adult couple going shopping it is still cheaper to park in town. I like the idea of water buses but have concerns over the reality. The Wey is narrow and, with a river speed limit of 4mph, boats are too slow for anything but recreation. Except on the tideway, not even the Thames has such services. The addition of two new stations appears attractive but will slow down train journeys, which are already slower than at any time since the 1930s. Knock-on effects on localities where the new stations are built have not been worked out or presented. ie. Cost of housing will increase.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14162  Respondent: 11036289 / Osman Abdullah  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4
I object to policy I4 green and blue infrastructure. This policy is a box-ticking exercise with no teeth to it. It sits oddly with the plan’s onslaught on the Green Belt. The plan to build on large areas of countryside and to inset villages will cancel out any benefits from extending the principle of enhancing biodiversity beyond Biodiversity Opportunity Areas. There is no mention of the value of wildlife gardening to biodiversity or the important role that larger gardens play in a village setting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14113  Respondent: 11036289 / Osman Abdullah  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

I object to policy P1 Surrey Hills Area of Outstanding National Beauty. This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated. Much of my concern stems from the loose wording of the Policy, which in some places renders the policy ineffective, for example: “All proposals will be considered against whether they…” “All development proposals within and adjacent to the AONB will be expected to conserve or enhance its special qualities” Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage. Of particular concern is the paragraph 3, which begins: “Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits…” This whole opening clause is unnecessary and almost invites development proposals. I believe that it should be deleted, and the sentence should therefore begin: “There is a presumption against major development in the AONB in accordance with NPPF.” In addition to the weakness of the language, I am also concerned that the AONB criteria listed in the policy are not the most important ones in determining whether a planning application should be approved. Aside from the one outlined in the first bullet point (which relates to the AONB setting) none of these criteria is concerned with the key characteristics of AONB, ie landscape character, scenic beauty, important views, tranquility etc. Whether or not a development supports the rural economy or provides public access are of far less national importance than preserving the quality of the landscape itself. I believe that the AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and would like to see the following sentences reinserted: “The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered” “Proposals within the AGLV which would have a negative impact upon views into and out of the AONB and which do not respect the setting, will not be acceptable” In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/or AGLV may be necessary and deemed appropriate. Finally, I would like to see a clause which gives protection to the candidate areas for AONB status in the forthcoming Surrey Hills AONB Boundary Review. This should include Blackwell Farm which was recently reviewed by an Independent consultant and deemed worthy of inclusion.
as a candidate. I consider that all land that has been assessed as meeting the latest Natural England criteria for AONBs should be subject to the same level of protection as an AONB, not just land that has been designated AGLV.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14120  Respondent: 11036289 / Osman Abdullah  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy P2 green belt This policy states, “the general extent of the Green Belt has been retained.” This is a misleading statement. The policy wording is weak in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. Once gone it is gone forever. It is not the Council’s to give away. Policy P2 completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world. Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

1. Agricultural production
2. Rural leisure and tourism amenities
3. Water catchment
4. Flood control
5. Biodiversity
6. Natural heritage
7. A carbon sink for air pollution
8. Room for public facilities such as parks and burial grounds
9. Profitable film locations (e.g. Shere)
10. Future economic potential such as mineral extraction (even fracking)

11. Natural beauty, landmarks, open space, rural views and sight lines

12. Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF) As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations. It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. I object to the “insetting” of 14 villages from the Green Belt. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat. I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors. To “inset” two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead.

Furthermore I object on grounds of the impact this development will have in terms of congestion on our highways, these issues have been highlighted under ‘infrastructure’.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14122 Respondent: 11036289 / Osman Abdullah Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy P3 Countryside (i.e. beyond the Green Belt) This is more protective – as a policy – than the proposals for the AONB and the Green Belt, so is anomalous. I am not in favour of building on this area, since urban, brownfield areas are sufficient to meet all reasonable housing targets. There is no need to build on any green fields if brownfield, previously developed land is used efficiently (without garden-grabbing). This policy refers to the countryside near Ash and Tongham (see paragraph 4.3.28). This area does not justify stronger policy protection than any other part of the borough. The fact that the current and previous Council Leaders represent it should not give it preferential status: “we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”. Green Belt and AONB areas should by definition have higher levels of protection than non-Green Belt areas. It should also be noted that Ash and Tongham lie beyond Guildford far away from London and therefore make no contribution to controlling
Metropolitan urban sprawl, that is presumably why Ash and Tongham are not in the Green Belt already. This policy, however, attaches higher priority to preventing the “coalescence between the Ash and Tongham urban area and Aldershot” than it does to the primary purpose of the Metropolitan Green Belt, which is to stop London sprawl. I agree to the prevention of coalescence but this should apply to all villages including East and West Horsley and Flexford and Normandy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14125  Respondent: 11036289 / Osman Abdullah  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy P4 Flood risk and water source protection zones Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as Woodbridge Meadows Industrial Estate and the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside. I strongly believe that this policy should not be used as a convenient excuse not to build on the extensive area of brownfield sites between the station and Ladymead. Any new development in this area could easily be built on stilts with flood resistant ground floor parking in areas that are identified as high flood risk. This area has been built over successfully over the last 50 years. We do not need to stop now.

I do not support building directly on (as opposed to over) flood plain as the land is effectively a soak away, but intelligent architecture has been dealing with this problem for many decades in other parts of the UK and the globe.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14127  Respondent: 11036289 / Osman Abdullah  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to policy P5 Thames Basin Heath Special Protection Areas. This policy is not robust enough. The mitigation (cash compensation) offered for development in the special protection area is so small as to be meaningless. SANG (Suitable Alternative Natural Greenspace) is not beneficial since the sites identified or targeted are already green space. This is just using agricultural or wooded land as recreation land in order to justify building on other green spaces nearby. There is no actual increase in open space or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds – must also ensure that it is not using land which is adjacent to the Special Protection Areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/14105  Respondent: 11036289 / Osman Abdullah  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy S1 as stated and the presumption in favour of sustainable development. The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Policy S1 ought to set a clear framework. No definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts. The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is without value. Under this policy, any development will qualify as “sustainable”, thereby failing to apply the NPPF’s most important guideline. The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies. The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all. This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/14106  Respondent: 11036289 / Osman Abdullah  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to policy S2 the Borough Wide Strategy and the commitment to build 13,860 homes based on the Strategic Housing Market Assessment (SHMA) 2015 prepared by GL Hearn. The OAN “objectively assessed need” figure in the SHMA of 693 homes a year is far too high. I am very surprised and concerned that GBC have adopted the OAN of 13,860 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole. Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50% from the 594 new homes identified in their own SHMA. " Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”. This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement. However it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt. A detailed and comprehensive professional review of the SHMA dated June 2016 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 693 homes per annum to 510 homes per annum. The 41 page report by NMSS which can be found on the GRA website entitled “A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford”. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan. The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald. He is an independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit. NMSS found that the SHMA used in the Local Plan incorrectly adds extra homes to its basic demographic projection to allow for improving affordability of housing, increased student numbers and economic growth. The report found that none of these additions were justified based on the evidence presented within the SHMA. The report concluded amongst other matters that:

- The affordability of housing in Guildford is no worse than in other Surrey districts and boosting supply beyond the demographic OAN would not result in a noticeable improvement in affordability but simply in more people moving to the area.

- There are reasons for believing that the SHMA’s estimate of the number of homes needed for students may be too high and that an adequate provision for students is already included in the demographic OAN. The report advises that the Council should commission a separate student housing need figure for Guildford given the distorting effect of students on our overall OAN. It envisages that, once this exercise is undertaken, improved accuracy means the overall OAN would be likely to reduce still further.
The SHMA seeks to estimate the number of homes needed to support employment growth using employment rate assumptions that are inconsistent with the employment forecasts. This produces misleading results. An analysis of the Cambridge Econometrics and Oxford Economics forecasts using employment or economic activity rate assumptions consistent with the forecasts suggests that in neither case is there a need to provide more housing than suggested by the demographic analysis. Indeed, in both cases a smaller population growth (and hence fewer homes) could support the jobs growth that is forecast. A further independent report was procured in 2016 by the Campaign for the Protection of Rural England CPRE from Richard Bate of Green Balance, an independent consultancy with expertise in demographic and housing matters to carry out a review of the GL Hearn SHMA. The report by Green Balance runs to 37 pages and its findings are that the OAN for homes in Guildford should be reduced from 693 per annum to 481 because:

1. the vacancy rate figures should be taken from local government annual records rather than from the 2011 Census. This would reduce vacancy rates to 2.9% in Guildford.

2. there should be no increase for affordability above basic demographic change.

3. there should be no increase for Student housing and it was considered unrealistic that the University should be allowed to exert such substantial pressure on the domestic housing market.

4. the use of employment-led forecasts should be abandoned using purely household projections instead which are more reliable as a form of prediction. Two completely independent expert reports are surprisingly consistent in their findings. In broad terms a figure of approximately 500 homes per annum would appear to be a correct estimate of OAN for Guildford. However, this is before constraints are applied to arrive at an acceptable housing target. The SHMA is based on pre-Brexit projections for economic and population growth, including migration. These now need to be revised downwards. It is unacceptable that demographic and economic model assumptions have been withheld by GBC and cannot be checked making the process unaccountable.

The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA. Both the National Planning Policy Framework and National Planning Policy Guidance provide a clear policy direction that the overall housing target should be reduced by a variety of constraints to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors. I have corrected this omission below. Infrastructure policies should be planned at the same time as Local Plans but in this case they have effectively been left out and are not sufficiently developed. The Framework also makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt. THE NEED TO APPLY CONSTRAINTS Ministerial guidance in relation to building on the Green Belt is clear:

1. “the single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt” - Nick Boles to Sir Paul Beresford MP 7th February 2014.

2. “we were always very clear that we would maintain key protections for the countryside, and, in particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt” – Nick Boles to Sir Michael Pitt, Planning Inspectorate 3rd March 2014.

3. “Planning Guidance, updated in March 2014, also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt” – Nick Boles to Sir Paul Beresford MP 18th June 2014.

70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust
boundaries. Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements). Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 693 per annum to 500. In view of the comments above it would appear logical to apply CONTRAINTS in line with government policy to a corrected OAN. of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council. This would result in a more acceptable and practically achievable HOUSING TARGET of 250 homes per annum which over a 20-year period would be 5,000 homes. All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 20,000 objections made by residents to the 2014 draft plan and also relieve the additional problems of inadequate infrastructure. It would also mean that there is currently 8.5 years supply of housing (2131/250) which is made up of existing permissions granted (1,518) and completions made (613) during 2013/2015. (Monitoring Report by GBC 2015) The Brexit vote may have strengthened government policy further. Theresa May, the new prime minister, announced on 11 July that she is personally committed to protecting the Green Belt once she takes office. Whilst I have many significant objections to the GBC Local Plan I applaud the policy statement by GBC in their Monitoring Report, “We will continue to monitor the use of previously developed land, and continue to identify as many opportunities as possible for redevelopment of previously developed land.” I believe it will be to the benefit of all residents if GBC can apply themselves vigorously to this endeavour in order to protect the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1639  Respondent: 11036289 / Osman Abdullah  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

This document omits many important points that are to be addressed at a future stage. The information is, however, very relevant and necessary and without it the document is weak on evidence. The overview given does not assess the capacity of existing supply to accommodate future growth. The paper acknowledges that almost 9% of commercial premises are empty and this somewhat flies in the face of arguments to vastly increase the volume until the reasons are understood. Around 30% of businesses are considering leaving Guildford (congestion being cited as a reason). There are also issues with planning permissions being granted to convert office space to residential, whilst at the same time it is argued that more offices are needed? The contradictions appear to indicate that policies related to this need firming up and that the evidence is incomplete.

I disagree with 40% of land in the town centre being given over to retail as there is no evidence that Guildford will 'buck the national trend' in terms of declining high-street sales, as has been suggested by Cllr Furniss. Guildford urban area ranks no 1 in terms of being the most sustainable location in the borough and, as housing is a priority, there should be more than 1,172 residences in the town centre.

I object to Policy E4 (expansion of the Surrey Research Park into the Blackwell Farm) The existing Research Park has been built at a very low density (25% plot ratio), which is very low for an urban extension. The majority of existing buildings are 2 storeys giving a developed floor space plot ratio of only 12.5%.
The existing Research Park has acres of surface car parking, which provides it with the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing density of the neighbouring academic buildings on the university campus at Manor Park, which is five times higher.

Together with the existing expansion of 14% through existing consents and the opportunity to increase its density, the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university, without utilising additional land.

**Infrastructure**

**I object**

The infrastructure schedule makes reference to 'improvements' without saying what they are. It includes a junction at the Guildford end of the A31, and another junction at Tongham. No evidence or traffic modelling data is available to demonstrate whether these 'improvements' will indeed improve anything at all given the additional traffic that will be generated by the new developments included in the plan. The Highways Assessment indicates that, even with these 'improvements', the level of congestion on the A3, A31, the B3000 and A25 will leave these roads over capacity and congested.

Constraints should be applied to the housing need/number as a full application of the overinflated number will have a severe detrimental impact on our road network. Smaller housing estates may be more difficult financially, but they would have less impact on infrastructure and could be considered where infrastructure already exists. The borough has many acres of surface car parking which, if replaced by multi-storey versions, and combined with current Brownfield sites, would free up enough land to build housing where it is wanted and needed and not on valuable Green Belt. There would be no need to build high-rise style development in Guildford town, which we don't support, but we do believe that buildings of 6-10 storeys (with underground parking) would be in keeping in some urban areas (where they don’t impinge on important vistas). [Some existing buildings already reach 5-7 levels in height].

The traffic maps omit the area south of Guildford borough completely and the lack of detail about impact on the B3000, a strategic route, is highly questionable, particularly as there are no solutions in place to deal with the impact. I am particularly concerned that, after the main highways routes of M25, A25, and the A320, the B3000 will incur the greatest increase in flow as this road is already close to capacity, with tailbacks at peak times. The road is no longer fit for purpose and modelling shows that developments planned, and the introduction of a new westerly route through Blackwell Farm, will severely worsen the situation, whether major work takes place on the A3, or not.

**The Highway Assessment**

**I OBJECT**

The strategic highway assessment requires a great deal more work and hence I OBJECT to the inclusion of this as evidence.

The B3000 runs through Compton, a small village with many listed buildings, most of which are very close to the road. The road already carries in excess of 5 million vehicles a year with average flow rates exceeding most A roads. It is the only settlement area in the borough where pollution levels exceed EU regulations and it is close to capacity now, with tailbacks at peak times, which add to the pollution problem. [see legal section]

The study is highly misleading. It refers to a figure of zero additional traffic from scenario 3, which includes the traffic from the strategic sites, one of which is partly in Compton. The assessment does not make it clear that the modelling is extremely limited and only includes impact on developments within the immediate area. Blackwell Farm is excluded from Area 107 (part of Compton) as false boundaries have been set. I believe that the impact from the strategic sites will be far-reaching and will most certainly impact Compton and beyond. Each village needs to be able to see the impact that development will have.

The Highways Assessment concentrates on peak time traffic only and gives no indication of overall volume increases or traffic type using specific routes outside peak hours. Understanding of the overall increase is important, as there is a bridge
on the B3000 between Artington and Compton, which has a width restriction and may also require a weight restriction as it needs replacing within the next 2 years and no funding has been set aside for this. Instead Network Rail, SCC, GBC and Waverley BC continue to battle over responsibility for, and scope of, the project.

It appears that traffic data has been collected at different times of the year and over varying time scales in order to provide averages. This method of data collection can underestimate measurements by at least 30%.

Furthermore, I have been told that the person responsible for ratifying traffic data at Surrey County Council (SCC) has been off sick for over a year and that, whilst the daily data boxes continue to collect data, that data has not been collected or analysed for 2015. The data put forward for Compton's B3000 was based on a 3-week period in January and, as this was not representative, we understand it was removed. That said, the year-on-year data is for different periods and different times, varying from a few weeks in winter to longer periods over many months. I would like a more robust approach to traffic data collation.

The cumulative effect of the additional traffic generated by the developments in the proposed submission Local Plan will be to increase congestion, even with the proposed highway improvement schemes in place. More detailed analysis of the junctions and queuing is required. We question the conclusion that the developments would have an acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF’. We do not believe that the impact on the B3000 will be acceptable, as it is already operating beyond capacity, and this situation will be made much worse following the mitigation proposed for the A3.

The Highways Assessment is limited to 30 results. Roads have been omitted from the report and it is unclear whether findings for the B3000 (also referred to as The Street B3000) are in fact from the Street or the roundabout from which there is a feeder road to Godalming via Priorsfield Road.

The table comparing scenarios and the impact on traffic is difficult to decipher. Scenario 1 includes current planning permissions plus Waverley's strategic sites. This shows an increase of just 9 vehicles per hour at peak times on the B3000. The next scenario 2 is the same, but includes GBC's strategic sites. Given that there is a strategic site in Compton of 1,800 homes and another of 1,000 at Normandy, the expectation would be for the volume to be not only higher, but considerably higher. The result is however, ZERO. We understand that this is because the impact measured is only from the immediate area and, as Blackwell Farm has been removed from the village for modelling terms, this does not give a realistic result. The omission of the Town Centre Master Plan and its impact on the roads further diminishes the integrity of this Highways Assessment.

Even without the full impact being understood, it is clear from the scale of development on the west of Guildford (1,800 homes at Blackwell Farm, 1,000 homes at Normandy, 1,300 homes at Ash, 3,800 homes in the Aldershot urban area, 1,200 homes at Borden) that the increase in traffic on the B3000 and other main routes would be severe.

The Highways Assessment shows that as a result of the proposals put forward in this draft of the Local Plan the B3000 will suffer the highest increase in flow rates at peak times (after the M25, A320 and A25. It also reveals that traffic flows would increase if the A3 was widened, as the A3 would then attract more traffic via the B3000. Despite this, there are no solutions planned to mitigate the situation and we are therefore strongly objecting to the level of development and in particular strategic development at Blackwell Farm as outlined in the Local Plan.

The proposal to introduce a new route to Guildford town centre from the west via Blackwell Farm has been ill thought out. The volume of traffic that will use this new ‘rat run’ through the new development and the university campus/business park, has been underestimated. There will be problems for traffic wishing to exit the new development in both directions during peak hours - traffic is frequently queueing for miles along the A31, and the Tesco roundabout is one of the worst bottlenecks in Guildford. The knock-on effect on the Egerton Road/Gill Avenue junction would impede emergency vehicles getting to and from the hospital.

The 4-way junction on the A31 has no detail at all and the concern is that permission in principle will be given to the site in the hope that these problems are surmountable. If they are insurmountable, which I believe they are, then enormous amounts of Green Belt land within the setting of the Surrey Hills AONB will have been sacrificed for nothing. The 4-way junction, if it goes ahead, is likely to be huge and, due to its elevated position, will cause significant harm to the AONB in terms of landscape and light pollution.
The Highways Assessment has many limitations, not least being the absence of the Town Centre Master Plan, which includes potential road closure and re-routing. Compton is likely to be very much affected by any reduction in road capacity in the town centre and it is important that we are presented with the whole the picture.

The Assessment acknowledges that not all impacts of proposed Blackwell Farm development have been modelled and that, due to the emphasis on the A31 and the A3, not all roads were included.

The report concludes that the improvements to the A3 are necessary to maintain adequate flow rates on the strategic network. Further work is needed to determine what impact any widening or junction improvements will have on local roads, and what will be done to mitigate against the increased flows through Compton, particularly given that a section of the B3000 though the Village is anticipated to become an Air Quality Management Area. GBC has resisted requests by members of the PC to have the northern end of The Street made an AQMA, but readings of nitrous oxide in this area are well above EU legal limits.

There is little information about the tunnel but the map indicates that one access / egress point will be in Compton near the A3, although no land has been safeguarded for this purpose. This is likely to have the same impact as the improvements to the A3, i.e. increased traffic (and pollution) through Compton.

The Spatial Hierarchy

The spatial hierarchy, which outlines Guildford's preferred strategy, does not match up with the proposed plan. The hierarchy places Brownfield sites (including those on Green Belt) as a priority, but the Plan has 66% of development on Greenbelt and only 34% on Brownfield. The hierarchy lists Guildford town and urban areas as a priority followed by inset villages and identified Green Belt villages. A relatively small percentage of housing is allocated for Guildford town (the most sustainable location) and Green Belt areas, such as Blackwell Farm, with high sensitivity have been classified as within the 'Guildford urban area' when they are in fact in the open countryside. We are told that only 1.6% of the 89% Green Belt has been earmarked for removal and that the 6% removed via insetting doesn't count as these villages are already developed. If this is the case, why list them in 4.1.16 of policy s2 - Spatial Strategy?

4.18 The preferred options cannot accommodate all that Guildford 'needs'. This is untrue. Two specialist consultants have independently critiqued the OAN and both question the level of uplift and the use of ONS data without full correction for changes and anomalies. They refer to 'double accounting' as the uplift is introduced at several stages and the assumptions that result in the final OAN are not explained. See comments on Strategic Housing Market Assessment (SHMA).

Strategic Housing Market Assessment (SHMA)

I Object

The “objectively assessed need” figure of 693 homes a year is too high.

A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the SHMA method should be changed to consider student housing need separately due to the distorting effects of students on the figures.

The current SHMA inflates the proposed housing figure due to:

- failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability, and
- flaws in the method for estimating the number of homes needed to support job growth.

It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

Two additional reviews of the SHMA reach similar conclusions, one having been produced by CPRE and the other by Cllr. David Reeve.

The Land Assessment
I object

The exclusion of sites of 5 dwellings or fewer from the list might make administration easier, but the addition of these sites plus windfalls and outstanding (but current) permissions gives rise to a higher number of dwellings than is actually needed. There is therefore no justification for release of all the Green Belt put forward.

The criteria used to include or exclude sites because of this study lack consistency, with many sites excluded as 'unsuitable' with no further explanation offered (many of which were in the urban area of Ash). The assessment lacks objectivity and detail.

Green Belt & Countryside Study

I object

GBC’s Green Belt & Countryside Study does not value appropriately the “fundamental aim” of Metropolitan Green Belt or look strategically at options for developing in major settlement areas beyond the Green Belt. It is pointless for London to apply constraints to protect its Green Belt if areas within it, such as Guildford, choose to ignore this option. It is the same Green Belt and serves the same purposes, all of which are acutely valuable.

The way Green Belt is parcelled up and scored is invalid: serving 2 Green Belt functions well is as legitimate as serving 3 to 5 functions less effectively. The Green Belt sensitivity analysis is not a valid basis for informing decisions. This method also omits purpose one, on the basis that all Green Belt sites encourage regeneration of urban sites. This should not be excluded for it is valid and could even be argued to be particularly valid in areas close to the town. Boundaries used for Blackwell Farm were neither permanent nor defensible.

Proposed removal from the Green Belt of a number of relatively small sites where development of an exceptional nature has taken place, plus adjoining land, has lost sight of the scale at which Green Belt is effective.

Assessment of which villages to take out of the Green Belt does not adequately consider that villages contribute to the openness of the Green Belt, as seen from surrounding AONB.

A key principle of Green Belt is its permanence. The University Consultants stated this 13 years ago when seeking permission to take Manor Farm out of the Green Belt to create Manor Park. They reassured residents that the boundary would not be frequently moved and that Blackwell Farm would be opened up to the public for “informal recreation”. The same Consultant has now repeated this promise in putting forward the University plans to develop on Blackwell Farm, saying that the new boundary would be permanent for at least 25 years!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  SQLP16/1644  Respondent:  11036289 / Osman Abdullah  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Key parts of the evidence are still missing, flawed or based on withheld assumptions. The Strategic Housing Market Assessment overstates need, the Green Belt and Countryside Study uses a flawed approach, and the Transport Assessment is too late and incomplete to be relied upon to inform the Plan.

The Plan excludes the Town Centre Master Plan, which plays a pivotal role and fails to address the results of infrastructure difficulties, or use these and Greenbelt to constrain the level of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1645  Respondent: 11036289 / Osman Abdullah  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan preparation process has had inadequate regard for national policy, which attaches “great importance” to the “openness” and “permanence” of Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level.

The Sustainability Appraisal seems to have lost sight of the concept of Sustainable Development as described in the National Planning Policy Framework to the extent that we question whether it complies with the requirement.

The report states that there are no pollution issues in Guildford. This is not true. The A3 end of the B3000 exceeds Eu regulations and this should be flagged in the 2015/16 air quality report which the Council has yet to publish.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1640  Respondent: 11036289 / Osman Abdullah  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object

The plan is not so much positively prepared as avariciously prepared. I do not consider that it is reasonable to take on unmet need from neighbouring authorities, which have given greater protection to their Green Belt if it means our own is compromised on the scale being put forward.

*I believe that constraints should be applied to the housing target, which we understand equates to the objectively assessed need (OAN) as no reasonable constraints have been applied. The constraints that could and should be applied are Greenbelt and considerable infrastructure issues. The solutions suggested to accommodate the inordinate levels of growth are both inadequate and costly and the net result will be serious debt for many years if not generations.*

It was recommended by landscape consultant Alison Farmer Associates that the area known, as Blackwell Farm should be considered in the AONB boundary review, yet it was omitted in Surrey CC’s landscape evaluation. This meant the Parish Councils of Worplesdon, Compton and Wanborough had to fund an independent review to ascertain whether the area was a contender for AONB classification. The survey was carried out by in May 2016 by Land Management Services Ltd, which concluded that most of the 265 hectare farm was of a landscape and scenic quality that merited inclusion within Natural England’s revised Surrey Hills AONB boundary.

It raises serious question about the soundness of the evidence base when Surrey CC says that it only has to account for evidence submitted and not for that omitted? *The area within the proposed development site at Blackwell Farm should now be considered by Surrey Hills as part of the AONB boundary review and land to the west should remain undeveloped, as it is important to the setting of the AONB.*

The plan is not justified. Residents groups have suggested other strategies but these have not been tested or considered against the current trajectory, which has remained largely unchanged since day one.

Many aspects of the Plan were strongly objected to in 2014 and not only have these points been ignored, they have in fact been embellished or made worse. I refer to the points that GBC referred to in their own summary, which stated that most people objected to the scale of development and the harm to the Green Belt. At that time there were 4 strategic sites and now there are 5. At that time approx 50% of development was in Green Belt and now it is 66% with only 34% on previously developed sites. 58% of development is on just 5 sites.

*A more realistic appraisal of the town centre with more multi-storey car park development and less retail would make way for a greater percentage of housing in the town centre, which is after all the most sustainable and sought after area. Additionally, greater pressure must be placed on the University to house more students at Manor Park in order to free up affordable rented accommodation in the town for key workers.*

There is a conflict of interest when the developer (University) drags its feet over the provision of promised student accommodation (thereby putting pressure on the housing market) whilst at the same time seeking permission to build 1,800 new homes to help Guildford’s need? *The University is at least five years behind with programme of building student residences and staff housing. It is widely agreed among residents groups that the University must fulfil all of its current building plans and substantially increase the proportion of students on campus. If the University built the outstanding units, the housing need would reduce substantially yet much of this is omitted from the outstanding permissions list?*

GBC has approached development without applying constraints that are applicable such as Green Belt and infrastructure. It is wholly inappropriate to build a Plan without constraints when there is widespread opposition to this approach. Furthermore, there are serious doubts over the validity of the objectively assessed housing need. Housing need underpins the entire plan, and we are being asked to accept the figure of 693 on trust. Without an understanding of the methodology
behind the OAN, the public cannot 'buy into' this figure, especially as it has been illustrated by two reputable professionals that there have been errors such as 'double accounting', which has resulted in uplift. Both consultants have concluded that a more accurate figure would be around 500 new homes pa and the most recent one, which was done in pre Brexit -June 2016 acknowledges that due to the high number of International students here in Guildford a student SHMA would better inform this plan. Both consultants feel that the current SHMA is flawed and that the OAN of 693 is too high. These reviews will be submitted by CPRE and the GRA and we support the findings of both.

Putting 58% of development on 5 sites, which are within the Green Belt, or largely within the Green Belt, is not consistent with national policy. The definition of 'exceptional' is forming an exception or rare instance; unusual; extraordinary. What possible exceptional circumstances can justify 3 sites of approx 2,000 each and two of 1000 each, on Greenbelt. This makes a mockery of the term ‘exceptional’?

The plan has a maximum number and a hefty buffer. It has underestimated windfalls and overestimated need. It is likely therefore that if one of the major sites fails to come through, the Plan could still succeed in terms of numbers, but would fail in terms of impact on infrastructure and reliance on aspirational, but distant 'yet to be discussed' schemes such as railway stations, making the plan undeliverable. If more people are not given the opportunity to live in Guildford town, the night time economy cannot grow and if the gamble to use 40% of the land for retail fails, shops will close and we will have created a leafy green ghost town, whilst the villages outside the town will have changed beyond all recognition as the impact of urban sprawl takes its toll.

The plan puts many eggs into 5 baskets with 58% of all development on just 5 sites. If these are not deliverable, the plan will fail. This strategy has been roundly criticised by Inspectors in other parts of the country.

Taking on such a high OAN without scrutinising it and then taking land out of Green Belt to fulfil it, and using developer funding to secure infrastructure (which reduces significantly the proportion of affordable housing delivered) is destructive and risky.

It is inconceivable that 5 sites between 1,100 and 2,000+ each can be built on Green Belt land without affecting the purposes of the Green Belt.

AONB should be given the highest protection. Despite being put forward for AONB review Blackwell Farm was omitted and an independent consultant had to be commissioned by local parish councils. The findings showed that the area met Natural England’s latest criteria for AONB and should not therefore be developed but should instead be properly recognised.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account the impact on future AONB or for views in and out of the existing and future AONB from public areas as determined by planning policy. It is feared that if this site were approved and if access could be made possible without causing serious problems to the surrounding road network, that the AONB in this location would undoubtedly be destroyed.

GBC argues that it is necessary to remove more than 1.6% of its 89% Green Belt and to remove more than 6% of its Green Belt from villages (by way of insetting) in order to meet its need, yet at the same time the Council advocates making an additional area Green Belt? The area of land being put forward for inclusion within the Green belt is on the same ridge as two areas of Green Belt it wishes to remove (Normandy & Blackwell Farm). This approach lacks consistency.

Cllrs Paul Spooner and Matt Furniss have stated clearly that there will be no development without supporting infrastructure and that the infrastructure must come before, or alongside, development. It is difficult to see how this will materialise as developers’ CIL contributions (which will fund infrastructure) are paid from profits made from the development. This statement appears to be unenforceable and could offer false reassurance to residents who may support the Plan on this basis.

Developers are being asked to fund large amounts of infrastructure. They will offset this against any agreement for affordable housing and it is highly possible that affordable housing will not be built or that only a small proportion will be built. This was one of the key drivers and is factored into the housing need, yet may not be delivered. Where is the general analysis to see what level of affordable housing might actually be delivered given the level of infrastructure needed to implement this level of development on new sites?
The omission of the Town Centre Master Plan (on the basis that this has different timescales) invalidates two key components of the Plan - the Infrastructure and Highways assessments. The suggested road closures in the town centre and the resulting re-routing of traffic should be factored into the highways assessment, but they are currently omitted. The consequences of this could render the whole Plan undeliverable and I don't believe the Plan can be approved without factoring in the Town Centre Master Plan.

GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA), which CPRE and GRA consider unsound. The methodology for the uplift and assumptions made have not been made available and thus the openness and transparency required for public understanding as outlined in the NPPF has not been adhered to.

I understand that Highways England will not start to consider its intentions as regards the A3 in the vicinity of Guildford until 2018. It is difficult to see how plans can be approved without the inclusion of this information.

Network Rail has not made available for the public consultation any plans for a new railway station at Merrow, nor have we been told where the station car park would be situated nor how the railway bridge between Merrow and Burpham would be re-constructed to take the additional traffic. Likewise, there are no detailed plans for the railway station at Park Barn and Network Rail has not confirmed the status of either. These schemes must have a sounder footing to be included in the Plan if they are to be used to justify large developments nearby.

The access to, and from, Blackwell Farm (via the A31) has not been thought through. There proposed new route will likely be used as a rat run to the A3/Guildford, but this will put pressure on a congestion hot spot, and result in increased traffic at the Compton turn-off and Down Lane (home to Watts Gallery). It is also recognised that congestion at the Tesco roundabout will be made worse and this area is already subject to considerable problems. Additional traffic via the business park from Blackwell Farm will add to congestion at the Egerton roundabout and impede access for emergency services to the hospital.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account of the AONB, but this does not account for views in and out of the AONB from public areas.

The greenbelt sensitivity study is not objective. The reference to Blackwell Farm as 'South West Guildford Urban' is totally misleading as it is unadulterated countryside that fulfills all the purposes of Green Belt. I consider this Study, which was the subject of much criticism in the last plan, to be flawed, yet it remains in this Plan. Why?

The damage caused to the Green Belt by the addition of Blackwell Farm would outweigh benefits gained from development, as there is ample space and lapsed planning permission on the existing Manor Park land for development for student accommodation, which would free up affordable rented accommodation in the town.

The proposal for Garlic Arch was added to the draft Local Plan without any consultation under Regulation 18.

No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Guildford citizens.

No land has been safeguarded for a tunnel, which would show a real intent.

This consultation included 'significant changes' according to GBC, although most residents would strongly dispute this. Some key reports were added and 6 weeks was not long enough to properly digest the information and impart this to residents. Many additional questions had to be asked and many points required clarification, which essentially meant adequate information, was not made available until two thirds of the way through the consultation.

The level of objection at the 2014 consultation was considerable - these objections have NOT been dealt with, but have been carried through to a regulation 19 consultation, undeterred. This is not in the spirit of Localism or the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Cooperation is a two-way street. Guildford objected to Waverley's plans for Dunsfold on the grounds of increased traffic and in the same submission referred to positive consideration of unfulfilled OAN. Guildford also refers to its duty to consider Woking's unfulfilled housing. Guildford does not have land to spare to assist Waverley or Woking without taking vast amounts of land out of Green/belt, which is protected by the NPPF. Greed is not 'an exceptional circumstance' and if both Woking and Waverley (and indeed London as it is the Metropolitan Green Belt) prefer to protect their Green Belt then the question must be asked as to why Guildford is happy to relinquish its Green Belt land, especially in the face of strong public opposition.

Many also question the choice of just Woking and Waverley as partners in the SHMA as there are considerable links with Aldershot and Farnborough in Rushmoor, which have very different needs and their inclusion could have provided a better balance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the inclusion of Blackwell Farm in the plan and would like to attend the examination

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Attached documents:
The Plan is supposed to be informed by residents and by parish councils and residents' groups and their input used to formulate the Local Plan, not for it simply to be presented to them and objections and subsequent input ignored. Despite a great deal of effort from these groups and many like-minded responses, the Plan has not taken their concerns on board. The Plan has barely changed since day one and residents feel their views have been ignored and that the consultations have not been genuine. To add insult to injury, some of the key points raised have actually been exacerbated or made worse, such as the scale of development and harm to the Green Belt and issues over infrastructure.

The NPPF is open to interpretation, but it is our belief that GBC has chosen to interpret it in a way that lacks objectivity in an effort to appease developers in order to avoid costly court cases at a later stage. GBC has cited cases where development has been granted in an effort to justify this pro-development stance but has failed to balance this against the many sites where development has been refused.

To gain true public reaction, material presented has to be factual and unbiased and written without jargon and acronyms. This has not been the case. A degree of 'double speak' has led to absurdities such as 'affordable housing' which is over £300,000 i.e. ten times the average salary; 'safeguarding' which does not mean protection of land as most people would think, but rather potential future development and 'insetting' which means removal? It is recognised that these terms are not locally derived but all the same they are confusing for most of us.

Some Councillors have shown a lack of knowledge about environmental matters. Cllr. Gunning - webcast 24th May section 7 - 3:39

'About ancient woodlands, of course they are very attractive things, but they are ancient and trees don't last forever, so can we be practical about ancient woodlands and consider their value or their life, I should say, their life'

May 11th - Cllr Ellwood announced that he couldn't understand what all the fuss was about pollution as his Mother had lived (presumably unaffected by it) under the flight path at Heathrow?

Whilst people have been encouraged to take part in consultation, objectors have been subjected to name calling and public humiliation. There are too many examples to list and so I am listing the most recent. http://www.guildford-dragon.com/2016/07/10/letter-not-surprised-mr-patons-comparison/#comment-157440

The Local Plan has divided communities and highlighted weaknesses and alliances, which have resulted in a breakdown of trust between residents and those whose job it is to implement the Plan.

The Plan has been roundly criticized and objected to and yet it is presented to us once again. Many feel the consultations to date have been worthless and feel they have already made their points, which were ignored and will not therefore be making them again as they fail to see the point?

It simply is not possible to address infrastructure shortfalls by building in the hope that developers contributions will cover the costs as the level of development needed negates any benefits gained and in many cases, the situation is made worse.

Central government funding is needed to address current problems so that funding from development can be used to implement additional infrastructure needed to make new sites viable without damaging their surroundings. It must be accepted that geography and lack of previous investment leaves some areas with less opportunity to do this than others.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/347  Respondent: 11036321 / Vinciane Ollington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the lack of any evidence for the alleged housing need numbers

Nowhere in the Plan document can I find an explanation for why new houses need to be built other than the obvious that there are too many people. But this is addressing the problem in the wrong way. The problem of overpopulation is due primarily to the massive influx of immigrants. Successive Governments have failed either to listen or act on public opinion on immigration into the UK. Some in the last government have at last acknowledged that they failed spectacularly to control the numbers of people entering the UK from Eastern Europe and elsewhere resulting in serious problems of overcapacity. It is sheer madness and foolishness to try and resolve the problem of overpopulation by creating even more problems building more houses and destroying the green belt to achieve this.

GBC should not punish local residents for the errors of central government. Its residents will applaud GBC for standing up to central government and the constituents will have the confidence to re-elect GBC in the future if they properly support their constituents.

1. I object to the limited consultation period

The Council, having sneaked this proposal in at the last minute without any consultation whatsoever with the community, has only allotted six weeks to register objections to a document over 1,800 pages, this is half the usual time.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPS16/454  Respondent: 11036321 / Vinciane Ollington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I Object to the site A43 Garlick’s Arch

Garlick’s Arch is a 100 acre site of Green Belt and ancient woodland which should be protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/452  Respondent: 11036321 / Vinciane Ollington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I Object to the site A45 The Talbot

This is an unreasonable overdevelopment in a conservation area. Ripley has already been impacted by at least 7 new housing developments in the past 3 years, without any improvements in roads, bus services, schools are medical centres.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/453  Respondent: 11036321 / Vinciane Ollington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57
### I Object to the site A57 The Paddocks

Site A57 was part of planning application 14/P/00867 in May 2014 which itself was a blatant re-hash of planning application 09/P/01554. The caravan site had already been established at the time of the application, suggesting that a retroactive application was being sought. The unauthorised development of the site runs wholly contrary to the Council’s planning policies. The Council should attach high priority to its planning enforcement role and should not stand idly by where there are flagrant breaches of planning rules, particularly on a prominent site like this in a Green Belt / Conservation area.

Planning application 09/P/01554 was refused permission by GBC, and the appeal was rejected by the High Court in April 2013. Although the site’s continued occupation has been judged completely illegal, no enforcement action has yet been taken by GBC. GBC should take immediate action on the enforcement notices against illegal occupation. The Council is accountable for protecting the interests of the community and should not run away from its responsibilities.

### What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/1007  **Respondent:** 11036321 / Vinciane Ollington  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. **Congestion on the A3 and M25 trunk roads**

I object to the development of the strategic sites due to the A3 and M25 already being at capacity during peak hours. Highways England has no plans to look at improving the A3 before 2020. It is therefore not sustainable to identify sites for further development which will worsen the congestion on these motorways and trunk roads.

1. **Congestion on the local village roads and lanes**

Our villages are already suffering from severe congestion for much of the day. For example the Newark Lane and Rose Lane junction in the center of Ripley, which at peak hours, is regularly gridlocked due to the volume of traffic, made worse when Ripley High Street (B2215) is used as a detour/slip road when the A3 is jammed. I object to further development which will cause even greater congestion in and around our villages.

1. **Unsuitability of our local roads for heavy vehicles and more traffic**

Many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. For example, part of Newark Lane which was resurfaced for the 2014 Olympics cycle route and has been used subsequently for other cycling events, has had to have...
regular “fixes” to crumbling road surfaces and recurring potholes due to traffic volumes far in excess of the road surface quality used. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

1. Poor air quality concerns

Further congestion, particularly in built up residential areas will only lead to greater levels of air pollution. I object to further development, which will result a fall in the air quality.

1. Parking issues in local villages caused by larger population

Many of the affected villages, such as Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems, to which I object.

1. Local healthcare facilities will be overwhelmed

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. I object to the further stress it will put upon existing overstretched health services.

1. Local schooling facilities will be overwhelmed

Without proper planning and a commitment to fund new schooling, existing schools will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. I object to the further stress it will put upon existing overstretched schools.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Destroying the Green Belt

I object to the proposal to remove (“in-set”) Ripley, Send and Clandon from the Green Belt.

No one in this county, let alone this nation voted for destroying the Green Belt. We already live in one of the most overcrowded parts of the country. Roads are congested, schools are full to capacity and hospital/medical center waiting times are forever deteriorating. Just to drive out of our village in the morning can take up to 15 minutes to cover a few hundred meters. This is stressful and will only get far worse with more houses.

We are filled with despair at loosing what we have worked all our life so hard for. We have worked hard to ensure our family lives in “England’s green and pleasant land” (something that was even shown as a virtue of our nation in the Olympic opening ceremony), away from the suburban sprawl. All this is in jeopardy with this plan.

By building more and more houses, this will not only further congest an already congested road network, but the overcrowding will create further pressure on schools, hospitals, and other services, all of which will require more people to be employed, which will probably result in a further round of house building and so on. What is GBC doing to consider the wellbeing of their constituents? Was not happiness and wellbeing also on our Prime Minister’s agenda?

High volumes of traffic and congestion have negative effects. These include road collisions, the severance of communities, the costs of delays and the unreliability of journey times to people and businesses. Environmental impacts include traffic noise, air pollution and amenity issues. At a global scale, vehicle emissions contribute to climate change. Some parts of the major roads in Surrey operate significantly beyond their capacity, resulting in traffic congestion, and forcing drivers down rural / country lanes to avoid main roads, leading to further congestion and road accidents.

If Surrey has a high quality of life and the borough is ranked as one of the least deprived 10 per cent of boroughs in England and one of the best places to live in the UK (Halifax quality of life survey, the Family Friendly Hotspots report), why is GBC looking to diminish this by proposing these plans?

Central London imposes congestion charges and astronomical parking charges in order to limit traffic and its associated problems in central London so as to afford its residents a better quality of life. Why can this logic not be applied to those living in Guildford Borough/Surrey? Why are GBC proposing the opposite in suggesting more houses be built?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. Disproportionate size of sits in relation to rural locations

I object to the allocation of land to the strategic sites of Garlicks Arch (Ripley/Send border), Gosden Hill (Clandon) and Wisley Airfield. The proposed development of these sites will have a disproportionate impact on the surrounding local villages. They will have a permanent and negative impact on each of these communities.

1. Unbalanced allocation of development in one area of the Borough

Between the M25 and Burpham, a distance of only about 5 miles it is proposed that over 6,500 houses are built. This represents over 40% of the housing proposed in the Local Plan. I object to this area being hit so hard by the allocation of development, which is disproportionate to the rest of the Borough.

1. Gerrymandering

The concentration of Green Belt development is not only disproportionate to the rest of the Borough but has been disproportionately applied to Wards that are not lead by a Conservative borough councilor. For example, the Ward of Lovelace (Liberal Democrat) accounts for 15% of the Borough’s population but has been allocated 35% of the proposed house building. The Ward of Send (Guildford Greenbelt Group) has also been given a disproportionate amount of house building. The coincidence of this is statistically significant and demonstrates at best a form of punishment to Wards who did not elect a Conservative borough councilor and at worst a form of gerrymandering.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/693   Respondent: 11036321 / Vinciane Ollington   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The increase in housing numbers from 45 to 60 at Site A42 in Tannery Lane will have a significant impact on the already highly congested local rural road network around and within Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/691   Respondent: 11036321 / Vinciane Ollington   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the 2017 Revised Local Plan by Guildford Borough Council (GBC) for the following reasons:

Housing at Site A43 Garlicks Arch would be on Greenbelt Land.

The potential increase from 400 houses at site A43 Garlicks Arch is extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages.

The inclusion of 6 Travelling Showpeople plots with associated storage facilities is entirely inappropriate in a rural environment within the Greenbelt and there is no identified need within the Local Plan documentation.

The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan and so is out of scale with the proposed development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The potential for a substantial increase in industrial floorspace from 7,000 sqm to an unspecified amount at the site A58 Burnt Common does not provide local residents with enough information for a full and proper consultation given the ambiguity and lack of detail within the document.

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, tucked away in policy 4.4.23a and does not allow for full and proper consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
To keep this to the point I object to the proposed local plan. Building on the green belt is destroying the reason I love living in the area I live.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I absolutely object to the proposed changes to the intersection with the A3 at Burnt Common. Any encouragement of increasing the traffic off the A3 and through the village of Send would vastly change the village and bring the village to a standstill. This proposed change, which can only be to encourage traffic into Woking, would just create a big bottleneck at the junction at Old Woking as this road is at capacity (both directions) almost all day and particularly in the morning when there are constant queues. School children would be at risk as they go to school and old people particularly as they visit the Doctors surgery which is also on the road. There might be a benefit to have an access at Burnt Common to head north on to the A3, easing some of the traffic in Ripley, but this would only be a minor positive.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed developments at Send Hill. The road is not capable of receiving any more traffic the end towards the Church is very dangerous and is not suitable for the school buses that have to use this currently. I do not like driving this section of the village and only do so in absolute necessity. Any development would increase risk to accidents and possible loss of life. This development will also increase the traffic problems at the traffic lights at Mays corner.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The whole development of the village of Send should be very carefully considered. The infrastructure of the village is at the limits of capacity, the schools are full and Doctors Surgery is full, there is no more room for any more shops and the traffic gets gridlocked as soon as there are any problems, even if these are in Ripley or Old Woking.

I trust that this email will be read by the Planning Officer and my points given due consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/9100  Respondent: 11036417 / Len Ozanne  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the latest proposals for the development of the Send area and the loss of the Green belt around the village of Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3540  Respondent: 11036545 / Peter Bassett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the removal from the Green Belt of the former Wisley Airfield, referred to as Three Farm Meadows, and I OBJECT to Allocation A35, The development of a new settlement of up to 2,100 dwellings, as a new settlement does not accord with the designation of the site as Green Belt and the Council has failed to provide the exceptional circumstances required by the NPPF necessary to justify removal of the site from the Green Belt. It was accepted by the Leader of the Council at the Advisory Board in April 2016 that the Objectively Assessed Needs (OAN) figure was exceeded. There is no need for the Council to exceed its OAN but the Local Plan proposes to do so by causing harm. The OAN can be satisfied by development of more sustainable sites; there is no need for A35 and so there cannot be any exceptional circumstances justifying it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Sustainability

The Former Wisley Airfield is within the least accessible part of Guildford Borough, remote from rail stations with poor local roads and lengthy bus routes and, given the proximity of the A3, it is implausible that development would prove to be attractive and safe for cyclists. The development is too small to be self-sustaining and yet large enough to cause substantial adverse impact.

Deliverability

The site was subject of a recent planning application for a quantum of development comparable to that in the Proposed Submission Local Plan and with a very similar boundary. The application was recommended for refusal and refused unanimously in April 2016. Despite 15 months of negotiation with the applicant, Wisley Property Investment Ltd (WPIL), additional issues of impact on the Special Protection Area (SPA), impacts on the strategic and local highways network, sustainable transport, affordable housing, air quality and education could not be resolved. The failure of the planning application confirms that there is no reasonable prospect that the project can be delivered.

Soundness

The reasons for refusal of the planning application submitted by WPIL and the failure of the applicant to resolve issues for a proposed development comparable to the Local Plan allocation confirm that the allocation is unsound. The allocation i) does not provide sustainable development ii) is not supported by exceptional circumstances to justify removal of the Green Belt designation and iii) lacks realistic prospects of delivery.

I OBJECT to the removal of East Horsley and West Horsley from the Green Belt. The NPPF requires the provision of exceptional circumstances to justify alteration of the Green Belt Boundary. The Council has failed to provide the necessary justification. Therefore, allocations A36 Hotel at Guildford Road East Horsley, A37 land at the rear of Bell and Colvill Epsom Road West Horsley, A38 land west of West Horsley, A39 land near Horsley railway station Ockham Road North West Horsley, A40 land north West Horsley and A41 land south of West Horsley should be deleted as allocations for residential development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Green Belt

The Green Belt designation of the site prevents the sprawl of the urban areas of Guildford, Woking, Leatherhead and the Metropolitan area. Previously developed parts of the site such as the runway, taxiways and the aircraft hardstanding are all open and, therefore, buildings on these areas will cause considerable harm to openness and the Green Belt. A new settlement would represent inappropriate development in the Green Belt, would cause significant harm to the character of the surrounding area and significant harm to the setting of a Listed Building. Development of this Green Belt site will discourage urban regeneration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7815  Respondent: 11036545 / Peter Bassett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Guildford Borough Proposed Submission Local Plan Strategy and Sites, June 2016, proposed strategy that in excess of 65% of the proposed residential development be built within the Green Belt. The National Planning Policy Framework (NPPF) requires the provision of exceptional circumstances to justify alteration of the Green Belt Boundary. The Council has failed to provide the necessary justification.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1070  Respondent: 11036705 / Brian Slade  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the New Local Plan in general since it fails to protect Guildford Borough Council's stated objective on their Website of "protecting the borough's most important countryside, landscapes and heritage". It clearly fails to achieve any of these objectives in the case of Send Village whose History dates back past the Middle Ages and proposes development of 480 houses and 7,000 sq metres of industrial and warehousing space which will destroy Send's living environment; local countryside; areas of natural beauty; and ancient woodlands - let alone a village community which has survived for hundreds of years.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1707  Respondent: 11036705 / Brian Slade  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to POLICY A 43.30 ha LAND AT GARLICK'S ARCH Burnt Common 400 house and 7,000sq metres of industrial and warehousing. There is no need for any more houses or even as many houses as the new Local Plan states are needed (13,860) - neither is there any need for the additional 7,000 sq metres of industrial and warehousing space. If there is a need for more industrial space it could easily be developed on the existing industrial site at Slyfield. A new 4-way A3 interchange to service this development (which for the reasons stated above) would therefore not be needed. In addition there is photographic evidence of flooding on the site. If it were developed it would destroy the village communities of Send, Ripley and West Clandon and their quality of life and health and cause major problems in relation to Road Safety.

I OBJECT to the fact that POLICY A 43.30 ha is a NEW site not included in the Regulation 18 Draft and has NOT been consulted on previously. It is Green Belt land permanently protected by the NPPF which prevents the merging of settlements. There are no exceptional circumstances. It is a sensitive conservation site covered in ancient woodland and trees which have been there since the 16th Century and which would then be endangered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1706  Respondent: 11036705 / Brian Slade  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the NEW 4-WAY A3 Junction at Garlicks Arch, Burnt Common which is a NEW Site not included in the Regulation 18 Draft and NOT previously consulted upon. This will cause major increases in traffic volumes which the existing local road infrastructure will be unable to cope; seriously increased pollution affecting the Health and Quality of Life of local residents and wildlife; and the loss of ancient woodland and good quality agricultural land.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1708  Respondent: 11036705 / Brian Slade  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the fact that POLICY A 444.1.9 ha LAND WEST OF WINDS RIDGE AND SEND HILL designated for 40 homes and 2 Travellers Pitches. This site is NEW and was NOT included in the Regulation 18 Draft and has not been consulted upon previously. Development for housing is inappropriate due to its permanent Green Belt status and it is a Green Belt amenity within an area of natural beauty which would be totally spoilt by any development. The site contains documented contaminated land which is vented. Also the site of the proposed Travellers Pitches can only be accessed via a narrow single track country road which makes access very limited and thus unsuitable for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3739  Respondent: 11036705 / Brian Slade  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT that the already overloaded infrastructure and existing transport overload seems to have been completely ignored in the case of Send as has the existing traffic congestion during peak times in Send and in particular the A247 being used by large commercial vehicles for which the road is totally unsuited. This is without the inevitable significant overload which will be caused by the proposed additional housing population and industrial development which is just not sustainable and will cause major inconvenience and significantly increased pollution for the existing population of Send. Additional housing is already being developed in Tannery Lane as well as the Marina being developed using a narrow road with a dangerous junction onto the A247 in the middle of Send Village. Send is already becoming the through route from Woking to the M25 and A3 and will become gridlocked all day - even without the proposed NEW 4-Way A3 Interchange This alone will destroy the village and cause major Health and Safety problems, particularly in relation to the major school development and merger of two schools which fronts onto Send Barns Lane (A247) where parents already cause serious parking congestion and traffic problems with just the one current school without the addition of the new second one.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/3740  **Respondent:** 11036705 / Brian Slade  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY P2 REMOVING SEND FROM THE GREEN BELT. Send is an historic settlement dating back many hundreds of years and provides an essential buffer between the large urban conurbations of Woking and Guildford. Send contains areas of Special Scientific Interest as well as areas of natural beauty and ancient woodlands providing much needed habitats for wildlife - an amenity much enjoyed by Send residents as well as other GBC residents such as the Canoe Club. Without the Green Belt permanent protection afforded by the National Planning Policy Framework Developers would run riot - could not be stopped - and very quickly there would be no separation between Woking and Guildford as intended by central government in the NPPF to prevent the merging of settlements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** SQLP16/714  **Respondent:** 11036705 / Brian Slade  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Specifically:

I OBJECT to the fact that GBC has made major changes to the Plan which require another full consultation under Regulation 18 - not trying to get out of that full consultation by use of Regulation 19. This not only invalidates the whole process - but makes a mockery of it.

I OBJECT to the lack of Evidence supporting GBC Strategic Housing Market Assessment 2015 which is highly questionable and for which GBC has consistently refused to provide details of its calculations despite several requests to do so. I believe that the requirement for 13,860 new homes in the Borough is exaggerated - and even if the population were to grow by 20,000, based on an average family size of 2.5 persons in each home, the need would only be 8000. It would appear that the number of foreign students has been wrongly used to inflate the population need. The Green Belt
does not need to be built over to meet that need when 50% of the 13,860 new homes stated as needed could be built on existing Brownfield Sites. GBC's Transport Assessment was not even available to Councillors when the vote on the New Local Plan was put to them on 25th May which again questions the objectivity and competence of GBC and its Planners.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/715  Respondent: 11036705 / Brian Slade  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Lack of Evidence supporting the need for Industrial Development at Burnt Common since the latest Employment Land Needs Assessment in 2015 shows an 80% reduction in employment space need from the ELNA carried out by GBC in 2013. Bearing in mind the significant amount of vacant premises in the Borough and surrounding area there is no need for new commercial and industrial development and the traffic and pollution problems that will ensue because of it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/716  Respondent: 11036705 / Brian Slade  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

GUILDFORD BOROUGH COUNCIL HAVE NOT FOLLOWED CORRECT PROCESS. Since 2014 GBC have changed every major site in Send proposed for development - added a major main road interchange junction and varied their housing requirements from 430 houses in 2014 to 185 in April 2016 now revised upwards in this Draft to 485. These significant changes require another full consultation under Regulation 18.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/1251  Respondent: 11036705 / Brian Slade  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 18: The effect on facilities, services and other key issues
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<td>I object to Policy A42 change at Clockbarn Nursery, Tannery Lane because this has increased the proposed housing from 45 to 60 homes on a road with very restricted access being effectively single lane in places and an already congested and dangerous road junction with the A247 - despite hundreds of previous objections by Send residents. This is also an area prone to serious surface water flooding which can only get worse.</td>
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<td>I object to Policy A43 change - Land at Garlick's Arch, Send Marsh because, where despite thousands of objections it is now proposed that 400 homes and 6 Travelling Showpeople Plots are constructed despite there being no proven demand for Showpeople Plots in this area which is permanent Green Belt with no &quot;exceptional circumstances&quot; containing ancient woodland dating back to Elizabeth 1 that GBC are proposing to destroy. It is currently a Flood Zone 2 allocation having frequent flooding and is contaminated land with lead shot following 50 years of shooting activity. The proposed development will generate excessive traffic on roads that already get gridlocked in Send and Ripley at peak times and also join up Ripley and Send which is contrary to the key purpose of the Green Belt.</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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<th>Comment ID: pslp172/1253  Respondent: 11036705 / Brian Slade  Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
I object to Policy A58 change - Land at Burnt Common, London Road which was deleted from the 2014 draft due to all the objections because there is no proven demand now or in the future for additional industrial capacity. It would therefore appear that GBC is presuming that a new A3 junction will be built sometime in the future at Send and justify this excessive industrial development within a Green Belt residential/rural area.

Slyfield and Guildford still have empty sites and industrial units and the 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for the whole of Guildford Borough - not the excessive allocation of 10 hectares in Send alone within the Green Belt which will cause major traffic gridlock in the surrounding roads and join up existing villages - again defeating the Green Belt. It is also noted that the word "maximum" in the 2016 Plan has, very significantly, been changed to "minimum".

Existing roads necessary to service such a development do not have anywhere near the capacity to accommodate such a demand. This is totally unacceptable and smacks of an attempt at sleight of hand and dishonesty by GBC to confuse residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/301    Respondent: 11036705 / Brian Slade    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Green Belt, Policy 2 at paragraph 4.3.15 - Send Pusiness Park taken out of Green Belt because it is an old non-conforming user in an area of countryside of outstanding natural beauty which is also an area of special scientific interest adjacent to the Wey Navigation Canal; Tannery Lane has very restricted vehicular access in both directions; has major junction problems with the A247; is prone to flooding: and any further development of this area is inappropriate - not least because it detracts from the openness and effectiveness of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7221    Respondent: 11036737 / Charley Penny    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I further object to the proposed development at Clockbarn Nurseries (A42). The access to this site is inadequate as Tannary Lane and Papercourt Lane are very narrow and with the proposed plans for a Marina as well, these roads simply will not be able to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7223  Respondent: 11036737 / Charley Penny  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Areas of Garlick’s Arch are known for flooding and with increased building works it means more surface run off and higher likelihood of flooding in other areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7222  Respondent: 11036737 / Charley Penny  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the plans to add on/off slip roads at Burnt Common (A43a) as this will increase the amount of people coming off here and using Send as a cut through to the M25 and Woking. With the thousands of houses planned to be built around this area it will continue to put strain on the A3 which is already at capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16178  Respondent: 11036737 / Charley Penny  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

With potential developments of hundreds of houses in Pyrford joined with the thousands of proposed homes in this area, it will put the local infrastructure under such a huge magnitude of strain that has never been seen before.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16179  Respondent: 11036737 / Charley Penny  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have personal experience of what happens when the sewage systems are unable to cope and an unsustainable increase in houses will only exacerbate this problem.

The proposed developments will put even more pressure on local schools and healthcare services, which are already stretched.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16177  Respondent: 11036737 / Charley Penny  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- The large developments planned for this area, Garlick’s arch (A43), Wisley Airfield (A35) and Gosden Farm (A25) will put a significant amount of pressure on the local amenities. The transport links are not built for this level of development and with the lack of a railway station and poor bus links it means that a lot of people will have a car. The roads around these areas are small and are already gridlocked at peak times. With these three developments, as well as some of the smaller infilling of houses (including over 500 houses built in the Horsley area), there will be even more gridlock during peak times then there already is.
• The smaller roads of Polesdon Lane, Papercourt Lane and Tannery Lane will simply not be able to cope with the increased amount of traffic. This will put further strain on Ripley High Street, Newark Lane and Send Road which are always very busy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16180  Respondent: 11036737 / Charley Penny  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• As stated in Policy P2 the Green Belt was implemented to ‘prevent urban sprawl’ and provide opportunities for people to access the countryside. By removing these local, rural villages from the Green Belt it will lead to urban sprawl and will mean the individual villages will lose their identity. The Green Belt area around Send and Ripley also act as an important buffer between the larger towns of Woking and Guildford.

• There are no exceptional circumstances as to why these villages should be removed from the Green Belt. I know a lot of people live in these villages to be closer to the countryside and they should be safe in the knowledge that the rural area they have chosen to live in is in the Green Belt and protected from large developments. Garlick’s Arch is also home to some areas of ancient woodland which are not protected as part of the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16176  Respondent: 11036737 / Charley Penny  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

With 5,000 homes planned to be built in and around the Ripley, Send, Horsley, Clandon and Burpham area, it is completely unsustainable and will damage the local area and its infrastructure.

There are far too many plans for houses to be crammed into an area which can’t take it, rather than using existing brownfield sites closer to existing urban areas and transport links

In conclusion, I object to the new Guildford proposed Local plan because of the enormous pressure it will put on the local resources and amenities, the increased amounts of traffic and the loss of rural identity. I specifically object to the developments at Wisley Airfield (A35), Garlick’s Arch (A43), Gosden Farm (A25) and Tannary Lane (A42) as well as the
other smaller plans in Horsley (A36-A41). I urge the council to take these objections into consideration and reconsider the removal of the Green Belt status.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/475  Respondent: 11036737 / Charley Penny  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of Send Business Park from the Green Belt (4.3.15)

There is no need for this area to be removed from the Green Belt and no reason has been given for this, therefore there are ‘no exceptional circumstances’ why this should be removed from the Green Belt. If this was to be removed, as well as the building at site A42 these areas will soon merge, giving the potential for more homes to be built.

Overall I strongly object to the changes that have been made to the proposal especially to Garlick’s Arch and Clockbarn Nurseries, and I think the imbalance towards the Ripley, Send and Wisley area is grossly unfair and will completely ruin the whole reason people move to and live in the area. I hope the council take on board these points and amend the plan accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1774  Respondent: 11036737 / Charley Penny  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the imbalanced allocation of housing sites across the borough

The biased allocation of houses towards this area (over 40% of proposed homes are planned within 3 miles of Send Marsh) is completely unfair. Most of these houses are to be built on Green Belt (as we know it now) and will completely ruin the area. Removing these homes from the Green Belt, even with limited infilling as proposed for Ripley, will only lead to more homes being built and the problem increasing.
People who move to this area in the Green Belt should be safe in the knowledge that building within the Green Belt is limited and is to only be removed under exceptional circumstances, none of which have been proposed. The resources are not made for it, especially the narrow lanes where people cut through to avoid the A3 and to get to Woking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3496  Respondent: 11036801 / Judith Mercer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to POLICIES A36,A37,A38,A39,A40&A41, for reasons below:-

-Proposed amount of new housing far exceeds local need.( e.g see local survey -Surrey Community Action Housing Survey 2014)The need for so many houses to be built in West Horsley over the first 5 years of the plan period is totally unproven.

-There is no local support for them

-The density for new housing on the 6 Horsley sites is inappropriate as it is greater than anywhere in the present locality

-They would transform the 2 rural villages into a large urban development for which there is no justification.

-The collective impact of all sites on the Horsleys should be studied.It is clear that it would have a devastating effect on infrastructure and services and have an adverse impact on well being in the area e.g air quality and noise pollution would worsen.

-The West Horsley defined Settlement Area boundaries(ref2003 Local Plan) DO NOT need to be extended.Too many green fields adjacent to the current housing in the village would be allowed to be developed.Sites allowed on the edge of the settlement boundaries causing extension of the boundaries would cause creeping urbanisation contrary to NPPF 79,where it closes the gaps between Horsleys and neighbouring settlements.Large sites proposed for development such as Wisley Airfield(A35) and A25(Gosden Hill Farm) would also contribute to this to the detriment of the Green Belt.
- The total amount of new building would be out of scale with the planned development in other parts of the borough, especially more urban areas not protected by the Green Belt.

- Building 533 new houses on these sites is excessive, not in proportion to the rest of the borough and will destroy the rural character of these communities. The proposals are unsustainable in terms of schooling, drainage, roads capacity, shops, parking in East Horsley at station and shops and public transport.

- The key evidence document 'Guildford Borough Economic Strategy 2013-2031' makes no case for locating large numbers of new homes in West and East Horsley, or neighbouring villages.

- Site A40 not viable due to high water table and poor drainage leading to winter floods, and there would be many other safety issues that would have to be raised concerning access, traffic, facilities for pedestrians etc.

- Development of these 6 sites in the Horsleys would together harm the access to the amenity of the Green Belt and its recreational value and compliance with NPPF 81. This would be caused by congestion on all surrounding/narrow roads harming safe activity such as cycling. The development would ruin rural settings of nearby woods, open sites, walking and leisure areas.

I OBJECT also to POLICY (Site) A35(formerly WISLEY Airfield-Three Farms Meadow)

I OBJECT to this being in the plan for the following reasons:-

- It should NOT be included at all for all the reasons given by the Guildford Borough Planning committee which unanimously rejected an identical recent planning application for this development on 14 separate grounds (application ref.15/P/00012). It is a scandal that this has been allowed to be inserted into this draft plan just a day before the planning decision was delivered, a fact which the planning committee must have known full well as they delivered their decision!!

This is tantamount to bias towards the developers and is totally unjust, making a mockery of residents' serious concerns and worries in relation to this proposal for development.

The Council planning officers have surely acted irregularly if they have allowed Wisley Investment Properties to present this application out of time.

Grounds for rejecting the application included the following:-

- no "exceptional circumstances" have been shown to give reason to build on this predominantly Green Belt site itself surrounded by Green Belt.
- loss of good quality farmland (55% of the site) contrary to national policy

-too close to Thames Basin Heath Special Protection Area (TBSPA)

-the description given that it is brownfield land is a misrepresentation. Less than 15% of the site constitutes brownfield and it is next to the SPA which has an exclusion area of 400m in respect of housing. The remains of the runway is now a rare flora and fauna habitat and no permanent dwellings have been built on it. The entire plot of land including the former airstrip continues to have Green Belt status.

-proximity to A3/ M25 bottleneck junction (junction 10).

-completely inappropriate location for over 2000 dwellings within the ancient village of Ockham disproportionate to the 159 homes in this village.

  • increased harm to air quality for the site, noise pollution and reduction of light would be to the detriment of the health and wellbeing of residents on and near the site.

-proposed Surrey County Council waste site is ignored in the proposal

-no proper traffic data

-SANG would cause harm to SPA

-extreme housing density with little space between

-damage to neighbouring communities by proposing to create a settlement of 5000 residents equivalent to numbers in both East and West Horsley combined.

-major impact on neighbouring villages, especially the Horsleys

-lack of information about the impact on the local water table and flooding on the site itself and areas of the local river Mole
- No existing public transport and stations too far away

- Ignores the collective impact this site, together with nearby development sites, would have on the area

- Unacceptable conflict of interest arising from the Conservative Party links between the developers and the Council, which has a Conservative party majority

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3986  Respondent: 11036801 / Judith Mercer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- All the proposed policies far exceed the local need.
- The proposed density is far higher than any existing locally or in Guildford, it is more reminiscent of London.
- The proposals are tantamount to the formation of a sizeable new town in the Horsleys. There is no justification for this.
- There is no local support for these policies.
- The collective and cumulative impact of these 7 sites has not been properly considered or assessed.
- The proposed developments are completely out of scale with existing and planned building elsewhere in Guildford.
- The sites are unsustainable. The vital improvements in infrastructure are missing (water, sewage, anti-flood provision, traffic management, schools, health, telecommunications)
- The Wisely Airfield site was rejected by the councilors and yet it is included in this proposal. Why? Things have not changed since the refusal and additionally, no account is taken of this proposed site on the Horsleys.
- The changes in the settlement boundaries are far too sweeping and the squaring off or regularizing activities will suck in many adjacent fields. The plan cannot maintain that this means they don’t contribute to the openness of the Green Belt.
- If Wisely Airfield were to be built on, the Green Belt space set between the neighbouring villages will become much smaller and is contrary to the entire raison d’etre of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6790  Respondent: 11036801 / Judith Mercer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to ALL POLICIES involving building in the GREEN BELT

As noted in P2 above, there are no "exceptional circumstances" shown. I object to the identification of these sites without regard to Green Belt, infrastructure or other constraints. The plan says it is not granting planning permission for developing these sites but it DOES identify the principle of development and uses. Why does it do this? In doing so it ignores many thousands of specific comments made to the Council about these individual sites since the consultation in 2013 (Issues and Options) and the plan has hardly changed since the 20,000 objections were received by the Council since the 2014 draft plan.

This amounts to the Council (and through its representatives) ignoring the law regarding Green Belt (as already mentioned above) and thereby ignoring the objections and serious concern expressed by the borough residents on the draft plan proposals put out for consultation to date. It amounts to an attempt to wear down the people through attrition. I personally and many others are sick and tired of having to repeat comments already made. Not only that but I question whether the Council by the way it has run its surveys and engagement of consultants, has been using its funds wisely.

I would ask that all Green Belt Sites should be removed from the plan until "exceptional circumstances" for development are proven as is required in the NPPF. eg. Para 88 says that "very special circumstances will not exist unless the potential harm to the Green Belt ....is clearly outweighed by other considerations". Time and again the Council has failed to provide us with justification for this draft planning on Green Belt sites/land. Short term considerations or housing "need" have been tested in court (Gallagher Homes v Solihull Metropolitan Borough Council 2014).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7421  Respondent: 11036801 / Judith Mercer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to each and all policies which propose building in the Green Belt. No 'exceptional circumstances' have been demonstrated. As confirmed by government ministers, 'the building of new houses does not constitute exceptional circumstances'.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to POLICY site A12 (BRIGHT HILL car park)

I object to changing the use of this site and would like the Council to retain it as a car park and not to build houses on it. This is an extremely valuable parking space for people coming to Guildford to shop, attending the nearby Adult Education centre and it acts as overflow parking for those visiting nearby residents whose roads are narrow and have limited car parking e.g. Brodie Road and Cheselden Road. In addition it gives valuable parking for patients who need to visit the Mount Alvernia Hospital on the top of Harvey Road, as there is always a difficulty in parking at this hospital. There is only a small number of spaces in Harvey Road and at the hospital itself.

I would not object to some small amount of landscaping to reinstate trees and vegetation on the edge of the area. This would enhance it.

The space and the views it affords are valuable to the town and offer some respite to the development around it. The views are wonderful from Bright Hill and any building on the site would destroy that amenity which we have enjoyed in Guildford for many years.

It may be classed as temporary but this car park has been there for many years, so I would argue that it could be regarded as being a permanent fixture.

This is an example of the Council having an eye to selling prime land (I would guess for luxury apartments?) in Guildford centre for profit without considering the consequences for borough residents and workers alike. Developing houses or flats on this site would ruin the use of a decent sized and easily accessible open air car park, destroy the views and would ignore the need to restrict development in this old conservation part of the town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to POLICY(site)A25 GOSDEN HILL FARM, Merrow Lane

This is another site proposed for considerable building on the Green Belt. For all the reasons as already mentioned above, this would amount to gross violation of Green Belt land and countryside. Development here would by its very nature irreversibly harm the Green Belt because the site contributes to the purposes of the Green Belt in accordance with the National policy laid down in NPPF, including to prevent urban sprawl.

This site covers a vast area and would affect several of the Green Belt villages in the area. It would increase air pollution, traffic congestion, quality of living and general wellbeing. It would adversely affect not only those in the immediate vicinity but all of Guildford town itself, putting extreme pressure on infrastructure already overwhelmed, and more stress on the everyday public and medical services for the borough. The impact would be felt far and wide.

There is no need for "special circumstances" given for this number of homes. If another school is felt to be required for Guildford then the Council must first consider areas of brownfield rather than sacrifice our Green Belt land.

It is imperative that we retain as much green space, trees, fields and wildlife habitat that we can manage to provide for better air quality, light and reduction of noise for the area. This proposed site would cause harm to all those things to the permanent detriment of the local environment.

This land could also be used for farming and food production which is of national importance.

Once these fields are built on they are gone forever.

For these reasons I OBJECT to this site being included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 11036801 / Judith Mercer</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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</table>
Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to POLICY Site A43a Land for NEW North facing SLIP ROAD to/from A3 at Send Marsh.
This has not been given permission by Highways authority.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14589  Respondent: 11036801 / Judith Mercer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to POLICY D4(Development in urban areas and inset villages)

There is no commitment to expand social housing or homes for people who can't afford so called "affordable homes".

There is a demand for urban regeneration and protection of the Green Belt, but there is not enough new homes planned in urban areas. There is a pressing need for these but it is ignored favouring instead homes built on green field sites, which will be not be affordable for low paid workers who work in the towns. This policy has been drawn up to help developers where it allows them to build on green fields which is 'easier' and potentially more profitable for them than helping to provide more urban housing.

Any aims for inset villages would be cancelled out by the plan for excessive housing. It is also unsustainable as building outside the town causes increased harm to roads, air quality and overstretched infrastructure.

The plan for more retail buildings would be inappropriate in view of the continual decline in this sector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14592  Respondent: 11036801 / Judith Mercer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E1 (Employment)

This fails to focus general business (industrial and commercial) activity in the urban areas or business parks that have the infrastructure already.

It does not make a comparison between this and appropriate rural business.

There is too much proposal for warehousing which already causes congestion for Guildford.

Analysis to support the policy is weak.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14593  Respondent: 11036801 / Judith Mercer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to POLICY E2 (Location for new employment floor space)

I oppose the policy of extending the Research Park onto Blackwell Farm. There has been no exceptional circumstances as defined in NPPF given to support such development on this area of Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14596  Respondent: 11036801 / Judith Mercer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3
I OBJECT to POLICY E3 (Maintaining employment capacity and improving employment floor space)

This policy resists change of use from B1a to C3 residential thus creating obstacles for the regeneration of brownfield land contrary to national government policy. Government policy has confirmed it permits this change (from B1a offices to residential use).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14598  Respondent: 11036801 / Judith Mercer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The intention to use rural areas for town uses goes against the principles of localism which require local people to be consulted and heeded and therefore not to be ignored.

The policy lists economic activities but they rely on the rural character of the villages to be maintained. This character would, ironically, be destroyed by the proposed "insetting", boundary extension and house building outlined in other parts of the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14601  Respondent: 11036801 / Judith Mercer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy E6 (Leisure and Visitor experience)

Why does the GBC feel the need to develop tourism through building of new visitor "attractions"? This way of thinking and planning could actually harm the visitor experience especially in the rural areas of the borough e.g. local residents’ arguments over the proposals for Newlands Corner.

In this policy there is a presumption in favour of development which risks the unnecessary over development/commercialisation of a leisure/tourist area which would in fact be harmful to it. The Green Belt and heritage sites are vulnerable to harm in this way and it should be specified in the plan on what basis they will be protected.

Guildford has many leisure and visitor attractions already and there is no case for creating more.

In this populated area, the lack of development is a positive asset to visitors, not a negative one. The rural setting and natural environment lends itself to walking and cycling activities without interference from the Council and is a valuable form of tourism.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16518  Respondent: 11036801 / Judith Mercer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This policy will allow development for more retail spaces in rural areas with is consequent housing expansion. This is not wanted or needed and is completely unjustified in the light of the explosion of online retail businesses. Guildford’s position of the primary retail hub would be hurt by this policy. Rural shops would also be hit as they would not be able compete with larger retailers. The whole character of the villages would change and they would be subsumed into the urbanisation and sprawl which is expressly against the provisions of the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16519  Respondent: 11036801 / Judith Mercer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The policy is an extension of E9 and is also an attempt to use an extension of rural local retail development as an excuse for changing the countryside in contravention of the NPPF provisions.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/14579  **Respondent:** 11036801 / Judith Mercer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

This policy does not set up any rules or constraints on building. There are no specific guidelines with regard to density and other important issues—no practical framework for planning decisions is provided. This free-for-all position should not be allowed because it cannot be tested objectively.

The residents of the borough need to be able to rely on a structure of a local plan where future planning decisions can be called into question.

I object to the proposal for housing based on out of date projections and on the SHMA which appears to be flawed and which has not been scrutinised properly.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/16515  **Respondent:** 11036801 / Judith Mercer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
The housing mix as proposed was developed before Brexit and gives the impression is that the “evidence” documents have been prepared to set out a position rather than to provide a neutral, objective and balanced judgment upon which to make decisions. The SHMA was not put out for public consultation and was not scrutinized by Councillors. It full of assumptions and is unreliable. It appears that a very large number of planning permissions obtained by the University of Surrey for homes and development have not been used and this proposed policy should not even be considered until this has been resolved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/14580  Respondent: 11036801 / Judith Mercer  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Using the term "affordable"under the national definition, refers to homes that are sold or rented at about 80% of market value. Unfortunately, the market prices of homes in the south east are so high that these homes are likely to remain way beyond the means of most people.

People do not have a right to live in a certain area, but they can have aspiration and wish to live in a particular place.

If more houses are built, even smaller ones they will not be affordable starter homes or homes for many families because they will be too expensive. They will be bought by people coming out of London and it is they that push up the price of the homes due to their demand for houses out in the Green Belt areas and a short commute from their jobs in London.

I object to a policy where the consequence will be that our green countryside will be ruined for the benefit of DEVELOPERS and COMMUTERS under the guise of homes for local people. This is a policy using the misnomer "Affordable" as a ruse for more development which will NOT benefit the local people. It will as a result destroy the Green Belt which gives space and fresh air to this borough, which ironically Londoners want to enjoy!!

The viability clause (4.2.40) means the policy in practice could be unenforceable. It should be removed from this policy as it only benefits the developers not the local area.

This policy will not influence the market prices in the Guildford Borough area because of the continual demand from London. Building more homes will not make them more affordable in the real sense of the word. The policy is wrong about its reasons for more so-called affordable homes and is using this as a pretext to promote more development generally, which in my opinion, we do not need.

Our Green Belt and green fields should not be given up in such a cavalier way. The Council has a responsibility to protect it all on our behalf and proper protections in all areas of this plan should be put in place to achieve that.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16516  Respondent: 11036801 / Judith Mercer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Affordable is completely subjective. Houses in Horsley are not very affordable and the result of this policy would not be to promote less advantaged homes, it would simply allow more houses for those who can pay! The whole tone of this policy is designed to suggest that it is reasonable for the Green Belt to be reduced in size to accommodate the need for more affordable housing and growth. Using this policy, market forces (not affordability) will determine the price and level of house building even more that in currently the case.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14581  Respondent: 11036801 / Judith Mercer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This is deeply worrying as a policy. This is a policy which seeks to introduce a scheme where housing could be built anywhere, where it might otherwise not be allowed, with no restriction, other than a general link to some connection with the Guildford Housing list. It would allow potential development outside settlements, even in Green Belt with a proposal to extend this to market housing. This is unacceptable.

It must be made clear in the blue box wording that the overriding requirement of the NPPF especially paras 87, 88 and 89 thereof will apply in the administration of this policy.

Please refer to NPPF 54 and the guidance of the National Planning Policy regarding unmet housing need-revised 6 March 2014: "unmet housing need (including traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the 'very special circumstances' justifying inappropriate development on a site within the Green Belt"
This policy should not be included until radically revised. Rural exception cases should be explicitly limited to cases of actual local –NOT Borough need, and be subject to the NPPF constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16517  Respondent: 11036801 / Judith Mercer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This policy is badly drawn and mistaken in its aim to allow exceptions for rural homes. The wording allows ‘market housing’ would allow developers to negate the provisions of the NPPF for exceptional circumstances and other restrictions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14590  Respondent: 11036801 / Judith Mercer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My objection is due to the following:-

- Infrastructure is not discussed as being a key issue for the rest of the plan or as a pre condition for development.
- Excessive house building in the countryside will not be supported by any funding or provision for infrastructure
- Large developments on green field sites require heavy infrastructure investment which will be more expensive for the public to fund.
- The plan does not set out provision of adequate infrastructure as a pre condition of sustainable development. It is put in as an afterthought buried in this policy. In all aspects it is giving priority to green field development over urban and brownfield regeneration. This creates a huge burden in terms of providing all the changes needed in
new roads, redesigning traffic, transport and many other services to support the necessary infrastructure. It needs major investment and CIL receipts cannot guarantee this being achieved.

- Draft CIL (Community Infrastructure Levy) scale encourages use of greenfield rather than brownfield land first.
- The Council is not planning the roads before allowing thousands of houses to be built and it lacks common sense: Traffic congestion which exists now is not being dealt with and planned for never mind looking at what happens if vast housing estates are built across the borough.
- Large roads may be in the pipeline but there is no thought for the smaller local roads which have to support the new ones.
- It ignores the vital fact that the GBC is not in control of highways and permission has to be obtained by either Surrey County Council or England Highways.
- It is in short a disastrous policy for the borough and its population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16520  Respondent: 11036801 / Judith Mercer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy II: Infrastructure and delivery.

Development in the Green Belt and wider countryside, should that actually be either necessary or desirable (which it is not) would have to be supported by the current infrastructure. There are no credible infrastructure funding provisions for additional development. The CILS are hardly sufficient as they are vague and lacking in scale and teeth and moreover they arrive after the event. It is necessary to build infrastructure before development takes place not as an afterthought. The whole plan must be underpinned with new or repaired: roads, water and flooding provisions, power, sewage, gas, telecommunications, bridges, schools, railway and bus services health services and so on.

The entire infrastructure is well past breaking point today. New and large developments of thousands of houses in Horsley and all the other villages with all the cumulative traffic and pollution increases would cause complete and utter collapse. In Horsley the lack of footways for example together with poor sightlines and dark and winding roads, will cause walking, motoring and cycling fatalities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14582  Respondent: 11036801 / Judith Mercer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
By the use of loose wording this policy has weakened the protection of the AONB rather than strengthening it! I object to the policy being dependant on the provisions of the Surrey Hills Management Plan, which apparently welcomes housing development and who knows, might agree to all sorts of development, now or in the future.

The policy states“Development proposals will be assessed against the provisions of the current Surrey Hills AONB Management Plan ”. Why?

Any development proposals should be assessed surely against the strict criteria of the National legislation NPPF which sets the policy, and which the AONB Board follows but then sets its own aims which are not properly scrutinised or regulated. The NPPF is the higher authority here and should be referred to within Policy P1, rather than a flimsy nod to Surrey Hills Management.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/14583  **Respondent:** 11036801 / Judith Mercer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )

I strongly object to the way this policy has been drawn up as it fails to robustly support the Metropolitan Green Belt, its value and the protection it is afforded by the NPPF and government statements. It makes up 89% of the borough. Support for this should therefore be at the heart of all local planning policy in the Guildford Borough. This policy on the contrary makes no such declaration of support for protecting Guildford Green Belt.

As already argued under Policy S1, the Green Belt is an important legacy to future generations, an asset and valuable amenity for Londoners and the whole country as well as for its current inhabitants.

P2 fails to assess the Green Belts value and treats it simply as potential land to be built on. It is far too precious an asset to be neglected in this way. The restrictions on the building on Green Belt enshrined in National law are there for many reasons. This draft plan risks, through unrestrained development, causing severe damage to the Green Belt and its environment. This involves impact on the following:

- local agricultural production
- rural leisure and tourism
- flood control
- water catchment
- biodiversity
- natural heritage  
- carbon sink and air pollution  
- room for public space amenities e.g. parks, burial grounds  
- rural business  
- natural landmarks and views  
- future economic potential such as mineral mining  
- natural beauty, landmarks, open space rural views etc  
- harm to public health and wellbeing (expressed in NPPF as giving physical and psychological benefit)

P2 seeks to allow excessive levels of development in protected areas ignoring views given in the last consultation and against policy issued in government statements in support of protecting the Green Belt. This precious area and amenity is not for the Council to give away. Councillors are arguing that there is an acceptable % of Green Belt that should be sacrificed to development. There is no such rule or justification for such set down in the NPPF.

It fails to take a fair approach by sharing out the burden of development between settlements according to and in proportion to their size.

Insisting on a disproportionate amount of development (most of it) to be in the Green Belt is counter productive and it would make better sense to develop new homes in the urban areas, including cheaper accommodation, where most people (Young and less well off) want to live and work. These areas could be regenerated in this way and fewer people need to commute, thus saving the environment as well, saving untold damage to the surrounding countryside which the whole nation can continue to enjoy. Once it is lost it is gone forever.

In particular, I strongly OBJECT to the "insetting" of 14 villages from the Green Belt. In their current state these villages continue to contribute significantly to the 'openness' of the Green Belt and their removal from the Green Belt has not been justified under this plan. No exceptional circumstances or other justification has been made to allow new Green Belt boundaries which would result from the proposed insetting. On the contrary, these villages should not be inset, because they represent the contribution to the purposes and aims of the Green Belt as specified in NPPF para. 80. It includes the importance of protecting the openness of the countryside and the settlements within it. Not only should the Local Plan be aiming to protect the very rural nature of these villages (settlements) under these provisions, but also the Green Belt itself.

NPPF para. 83 states that Green Belt boundaries should only be changed in exceptional circumstances, and in further guidance notes that housing need will not be regarded as "exceptional circumstances". Thus for my own village in West Horsley, the plan seeks to simply allow many houses to be built without any justification for them. As anyone who properly looks at the character of all the villages in their rural setting, they offer space air and light and the amenity we cherish for leisure and conservation of our heritage sites and wildlife. If we develop on these green spaces inside the villages they will be lost and so will the openness of the Green Belt area.
The policy ignores most of NPPF17.

The policy is based on a flawed Green Belt and Countryside Study, and it suggests that 2/3 of the borough's rural villages should be 'inset' because they no longer contribute to the purposes of the Green Belt. This is completely ridiculous considering the location of the borough.

Further this study should not be relied on as I understand it was not commissioned correctly and without Councillor authority.

This policy states "the general extent of the Green Belt has been retained". This is not correct.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16513  Respondent: 11036801 / Judith Mercer  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P2 concerns the Green Belt. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. Primary legislation ensures protection for The Green Belt areas in perpetuity. This proposed policy appears to omit large chunks of the NPPF concerned with the protection of the Green Belt. Policy P2 has no mention of a commitment to uphold Green Belt boundaries and protections, or setting clear tests to scrutinise plans and proposed planning decisions without fear or favour. I include a large number of detailed comments here on the impacts and harms which will flow from the proposed policies:

- Impact on natural landmarks and views
- Impact on rural business
- Curtailment of space for public amenities e.g. Parks, cemeteries, recycling.
- Disregard of impacts to water catchment
- No mention of impact to the natural heritage.
- Protection of Biodiversity, one of the key outputs of the Green Belt, is missing.
- Guildford in general and the Horsley in particular have high levels of traffic pollution exacerbated by the proximity to the A3 and M25 and also by the huge increase of traffic levels on local roads. The Green Belt is a large ‘carbon sink’ which helps to mitigate this pollution.
- The proposed policy would have a devastating effect on air pollution, light pollution and climate change and has been discounted or ignored.
- Flood prevention and control is missing or ignored.

- Local agriculture is clinging onto its fingernails, with the current onslaught of ‘land-banking’ and subsequent rural decline. As the proposed policy is so widely drawn and weak, it will effectively allow any development on Green Belt land which is mainly agricultural. This is completely contrary to the provisions and spirit of the NPPF.

- The Green Belt has been the subject of many assurances of support and protection from government and planning law. The proposals in P2 contain no declarations of such support.

- The 12 Core Planning Principles set out in NPPF paragraph 17 cannot be ignored by policy P2. The proposals to change the Green Belt boundaries are simply an excuse to allow any type of building within the Green Belt. This is in my view illegitimate at best and represents a reversal of the intentions of the law. The Green Belt is not the property of the council to give away and cannot be treated as such. It is not something to be treated as available for building with only a few inconvenient restrictions.

- This proposed policy allows the argument that there is some proportion of the Green Belt which can be sacrificed to development. The NPPF allows no such argument.

- The amount of ‘Insetting’ of most of the villages around Guildford is unjustified and disproportionate. It is an attack on the value of the countryside and its contribution to the openness of the Green Belt. It is also an attack on the nature and conservation of the entire area.

- There is no objectively scrutinized and assessed development plan for Guildford post the referendum on 23rd June 2016.

- It makes no sense to concentrate most of the proposed development on the Green Belt when brown field sites are barely mentioned.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 11036801 / Judith Mercer</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to POLICY P3(Countryside beyond the Green Belt)

This policy wrong as it results in giving more protection as a policy than the proposals for AONB and the Green Belt. I object to the idea of building on any green fields as there is sufficient brownfield (previously developed land) and urban areas to meet all reasonable housing need, e.g. River Wey/Walnut Tree Close area.

This policy (see para.4.3.28) refers to protecting countryside near Ash and Tongham. This area does not justify stronger policy protection than the rest of the borough including Green Belt. It should not be afforded special treatment. The area concerned does not contribute to the prevention of Metropolitan urban sprawl, lying further away from London beyond Guildford, whereas those villages to be 'inset' do contribute to preventing urban sprawl.

Green Belt and AONB areas should as a matter of policy be classed as having higher levels of protection than non-Green Belt areas.
This policy does not make sense as it is proposing a minor extension of the Green Belt in one place (Ash and Tongham) whilst trying to justify its major destruction in other places (the inset villages) which are currently in Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/14585</th>
<th>Respondent: 11036801 / Judith Mercer</th>
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I OBJECT to POLICY P4 (Flood risk and Water Protection)

If this policy is implemented it would restrict essential urban redevelopment and use of brownfield and hard standing sites in Guildford and its urban district, thereby putting more emphasis on developing in the countryside. The Council must get its priority right. It must implement policy to run through the whole of the plan to save countryside and Green Belt.

There is no additional flood risk where existing hardstanding is developed in urban areas.

There would be an opportunity to provide improved flood resistance to regenerated areas such as on the River Wey bank where a large amount of brownfield land is available for housing, if this policy was revised.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to POLICY P5(Thames Basin Heath Special Protection Areas)

This policy does not increase environmental protection. It is simply designed to allow building on otherwise protected areas.

The SANG(Suitable Alternative Natural Greenspace) is not beneficial as the sites identified or targeted are already green space. It is using existing agricultural or wooded land as recreation land to justify building on other green spaces nearby! It is non-sensical and obvious that it is a ploy to 'get round' the protections already in place.

The policy should give clear statements of the current protections which SPAs are afforded by the EC Birds and Habitats Directives. This site is also part of the Special Area of Conservation(SAC) (Thursley, Ash Pirbright and Chobham)-a statutory designated site.

SANG should in part protect the nesting of rare species of birds on the SPA by ensuring it doesn't use land adjacent to the SPA areas.

The plan is unsound where the Habitats Regulations Assessment on behalf of Guildford Borough Council(GBC) has failed to study the impact of the 7 proposed developments being less than 5km away from the SPA. Analysis from surveys of visitors to the SPA areas has shown an increase in numbers from within 5km of the SPA. In addition analysis reveals that the effect of dog and cat ownership would indicate a harmful effect on the TBH SPA through development of houses and other buildings also within 5km of the area not just a 400m distance away.

Therefore it would be reasonable to conclude that the SANG should also not be appropriate within that 5km distance from the SPAs thus giving proper protection from visitors and animals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to POLICY S1(Sustainable Development)

This policy has been given no definition, nor does it seek to give reference to its importance in the National Planning Policy Framework 2012 (NPPF). In accordance with Para 14 of the NPPF, sustainable development should be recognised as "a golden thread running through both plan-making and decision-taking" regarding local plans. This policy should give a clear framework. It has not done this and fails to set out clear principles for its application.

There is no mention of the Green Belt, which has been and is extremely important to Guildford and its environs and astonishingly no commitment to protecting it. There is a promise set out in legislation by means of covenant to protect green areas in perpetuity. As a result the law seeks to protect the Green Belt through the core planning principles laid out in the NPPF. Policy S1 fails to refer to most of these. Also it does not set out guidelines for applying sustainable development in practice to local planning decisions which may have long term damaging consequences.

There is no statement confirming how economic, social and environmental impacts should be balanced and differences resolved by the planners, leaving these matters far too open and therefore non-protective and without proper guidelines.

This Policy should commit to uphold the Green Belt boundaries and protections with reference to NPPF.

I object completely to this policy where it commits to approve planning applications "wherever possible" and "without delay" because it shows this draft plan to have a pro-development bias. The lack of guidelines confirming the NPPF presumption in favour of sustainable development makes this policy so vague that it would, in practice, mean virtually no constraints on any development.

This policy shows contempt for the Green Belt, ignoring most of the core principles in support of protecting it set out in paragraph 17 NPPF.

I come to the conclusion that this, as a policy, is useless.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There are more than 100 definitions of sustainable development and possibly many more, yet this proposed policy has no proper definition or tests to describe what it means for Guildford. Sustainable development often has to deal with opposing requirements for example the tensions between economic growth and the environment. S1 has no means of distinguishing between these conflicts or weighting them to allow proper decisions to be made. The wording ‘wherever possible’ and ‘without delay’ is completely biased and will allow virtually all or any development to qualify as ‘sustainable’. This is exactly not what the NPPF para 17 guidelines aims to achieve.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/14578</th>
<th>Respondent: 11036801 / Judith Mercer</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have the following objections to the proposal to build 13,860 new homes:

1. Numbers of homes based on growth and demographic data including migration, are no longer valid in view of Brexit. They should be revised to a lower figure.

2. No justification for the housing figure is given and the Council has failed to reveal the formula for its working this out. The public cannot be expected to be consulted without this information as it is fundamental to the draft plan, and therefore makes a mockery of the exercise!

3. No definite housing target for new homes is given, and the plan fails to make sense of its relation to an "Objectively Assessed Number" for housing need. This is confusing. Moreover the Council contradicts itself by saying it relies on the OAN being the number for houses because it is deliverable whilst saying the infrastructure problems may cause constraints. The plan does not say how many homes the Council want to build and therefore allows this figure to be made up.

4. The Housing Market Area (HMA) has been wrongly used incorporating 2 other boroughs of Woking and Waverley creating an area 'West Surrey' which is artificial and too small and ignores Mole Valley and Rushmoor nearby.
districts. Many people commute to Guildford to shop and study and live outside the Area. The figures are distorted and unreliable by the plan using this HMA. There is no reason why Guildford needs to build twice as many large housing estates as the rest of Surrey put together. It is a completely unbalanced proposal.

5. The very high numbers of homes suggested would change the character of the borough from mainly rural and Green Belt to urban creating a band of development out of London. It would destroy the borough for residents now and for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16514  Respondent: 11036801 / Judith Mercer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The idea of a single housing strategy for the complete borough is badly flawed. It is completely wrong to treat very different areas which have different requirements, in an identical way to attempt to justify the numbers of houses proposed by Policy S2. The secret method of counting the numbers of people and houses required, has not been scrutinized by the councillors and therefore must be discounted. There is no justification or explanation of the 13,860 houses required by this proposed policy and the growth and demographic data put forward are invalidated by the events of the referendum and subsequent Brexit. The council uses projected numbers produced by consultants (GL Hearn) who as part of the Capita Group, have a vested interest in building and development (surely a clear conflict of interest). Additionally there is no housing target. A requirement and a target are not the same thing and could thus be manipulated with impunity.

The effect of this proposed policy would be to devastate the villages and the environment around Guildford. According to the council figures, twice as many large housing estates are required in Guildford –more than in all the rest of Surrey put together. There is no justification for this. The character of Guildford would be irrevocably changed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp173/424  Respondent: 11036801 / Judith Mercer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
11. Supplemental-Appendix D Evidence Base

I object to the continued use of poor quality evidence base and lack of sound property market research that relates to the local market in Guildford. The documents providing key evidence are unsound unreliable and inconsistent because:

- key parts of the evidence base are flawed or based on withheld assumptions. The SHMA by GL Hearn has been found to be flawed and based on unverified and unscrutinised methodology. The provider of this assessment (GL Hearn) have not revealed their workings by which they produce the “housing need number” on behalf of the GBC. GBC in turn have failed to request this information from GL Hearn by not enforcing their Contract of Services with the said GL Hearn, which can be found in the GBC (Appendix 1) Standard Terms and Conditions of Provision of Services—which may be seen on the internet. One must conclude therefore that because of the inability of GBC to inform the consultation process of the information required, the SHMA should be disregarded for the purposes of evidence supporting this local plan.

- the latest SHMA 2017 still inflates the housing target figure because it is based on substantial errors in estimates by ONS of student migration flows where it is probable that flows out of Guildford have been under estimated by large amounts. This has been researched by a company SMSS on behalf of the GRA (Guildford Residents Association). It has led to a compelling conclusion that the report by GL Hearn may have overstated the need for homes in the borough by 25%.

- the ELNA has also been criticised for its lack of quality and accuracy. The argument for proposed industrial development at Burnt Common in the Green Belt and expansion in Surrey Research Park into the Green Belt based on “there is the possibility that some pipeline developments may not come forward…” is extremely weak and does not amount to good reason or exceptional circumstances for this extent and density of development. There are unused consents dating back many years which have not been taken up. Why? Because there has not been the demand and it is not proven in this evidence.

- I object to the intrusion into Green Belt for the purpose of local plan process. There are no exceptional circumstances that justify this. The plan would be able to identify and accommodate development needs in Guildford's urban areas and villages if it were based on realistic analysis without impinging on Green Belt. This is what government guidance has said. This is achievable if GBC lowers its housing and development target to realise what is actually needed. Brownfield and previously developed areas have the space to accommodate. If it cannot, it need not plan for so many houses or units. GBC have through this version of draft local plan gone against the NPPF as they are not adhering to the ruling that Local Plans must “plan positively to seek opportunities that meet objectively assessed needs and be flexible enough to adapt to rapid change unless any adverse impact of doing so would significantly outweigh the benefits or specific policies in the NPPF which suggest that development be restricted”.

The manner in which GBC has approached the local planning process has clearly been from a landowner/developer point of view. This is wrong because the local plan is for the local people not for the developers/commuters or short term gain. The plan should provide protection of the borough’s assets for future generations living in the borough, i.e. GreenBelt, AONB etc first and then plan realistically according to need as agreed by local residents, and plan improvements for infrastructure before committing to development. Therefore a more sensible realistic approach is required, whilst showing the NPPF will be adhered to.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
6. Policy A25 Gosden Hill
I object to the above changed policy for development of 1700 homes because:
- There is no proven need for housing on this site because the housing target is incorrect, inflated and ignores constraints.
- Gosden Hill is located entirely in Green Belt land. No exceptional circumstances have been demonstrated for building on this site. The above policy is in breach of NPPF paras 87-89. This site serves all 5 functions of Green Belt (NPPF para 80).
- I object to any form of link road being built. It would cause irreparable harm to the local roads and detrimental impact on already congested area. No common sense is being applied with regard to this policy whatsoever.
- No attempt has been made to evaluate properly the detriment to local and national road structures. Highways England has not approved a new on slip at Burpham and it would be against their requirements.
In view of all the above this policy is misguided and wrong and should be deleted from the local plan 2017.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3222  Respondent: 11036801 / Judith Mercer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No )

5. Policy A35 (Wisley)
I object to the changed policy A35 Wisley regarding the identified mitigation to address the impacts on Ripley High Street and surrounding rural roads. Traffic will need to pass through Ripley to reach Wisley.
My previous objections therefore still stand for this changed policy concerning the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow alias the former Wisley airfield, Ockham) because:
- following huge public objection, Guildford Planning Committee have unanimously refused a recent planning application for precisely this development on 14 separate grounds. However this site has been reinserted in the draft local plan in a deceitful way showing complete contempt for the borough residents. This was done only 24 hours before the planning decision, therefore showing developers they could try again
- there is no need for housing on this site because it is based on the local plan housing target which is incorrect, and inflated and ignores constraints. The SHMA by GL Hearn has been found to be flawed and based on unverified and unscrutinised methodology. The provider of this assessment (GL Hearn) have not revealed their workings by which they produce the “housing need number” on behalf of the GBC. GBC in turn have failed to request this information from GL Hearn by not enforcing their Contract of Services with the said GL Hearn, which can be found in the GBC (Appendix 1) Standard Terms and Conditions of Provision of Services—which may be seen on the internet. One must conclude therefore that because of the inability of GBC to inform the consultation process of the information required, the entire SHMA should be disregarded for the purposes of evidence supporting this local plan.
- Policy A35 should be deleted from the plan for all the reasons the proposed development was rejected by the Planning Committee, including:-

- all the reasons given in my previous objection to the site proposed in the draft plan 2016
- it is Green Belt location and no “exceptional circumstances” are given
- misrepresentation of the site as brownfield land. Less than 15% is brownfield, it is adjacent to the SPA and therefore within 400m exclusion zone for housing. The remains of the runway are now a habitat for flora and fauna and never had buildings on it
- proximity to TBHSPA (Thames Basin Heath Special Protection Area)
- proximity to A3/M25 bottleneck area
- absence of adequate traffic data
-further harm to air quality both onsite and nearby
-loss of high quality agricultural land (55% of the site) in breach of national policy
-inappropriate location of over 2000 dwellings within the ancient village of Ockham which only has 159 households
-presence of Surrey County Council safeguarded waste site
-cost of infrastructure needed would be detrimental to alternative more favourable sites
-damage to neighbouring communities of creating a settlement of 5000 residents equivalent to East and West Horsley combined with all the pollution that would entail namely light, noise, traffic and competition for local amenities and infrastructure
-impact of potential flooding
-failure to evaluate and therefore take seriously the cumulative impact of this and nearby development sites on the area
-I object to this Policy A35 as it would constitute a breach of NPPF law namely paras. 79-90. In particular all of it would be in breach of preserving the openness of the Green Belt (see case law and Boot v Elmbridge Borough Council February 2017). In view of the above in my opinion this policy should be removed from the local plan 2017.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3218  Respondent: 11036801 / Judith Mercer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A36

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A36-A41 East and West Horsley
I object to the changes to Policies A36-A41 (East and West Horsley).
The potential development sites have been reduced by two (A36 and A41) representing 138 dwellings. This leaves 4 sites which still represent 395 new dwellings. I object to all of these 4 sites remaining for the following reasons:

-they collectively represent in absolute terms, overdevelopment in East and West Horsley and in relation to the rest of the borough this is disproportionate. The many objections from residents have not been heeded, and the imbalance has not been corrected.

-no “exceptional circumstances “or any justification has been given in the plan for this unaccountable imbalance where 70% of all new development in the borough is to be on Green Belt sites

-the sites situated on the edge of the existing development in the Horsleys encroach on surrounding open fields and would require the extension of settlement boundaries. The plan does The plan does not give reasons or justification for this and the effect of development of new buildings here would be contrary to NPPF para 79 because it will contribute to urban sprawl by lessening and reducing the value of the Green Belt areas separating the Horsleys from neighbouring settlements.

-I object to any change of the settlement/village boundary reducing Green Belt as it would not only harm the openness and permanence of the Green Belt but would allow further applications for development on green fields. These fields serve the purposes of the Green Belt (para. 79-80), and also represent prime farm land. This would be contrary to a commitment in the local plan to protect Green Belt in the borough.

-the total of the four sites in Horsley breach NPPF 81 which encourages access to Green Belt for use of its amenity and recreation value
- these remaining policies will unnecessarily urbanise and be detrimental to the rural character of the Horsleys with no exceptional circumstances for this having been given in the plan. This justifies the continuing objection from residents. I would urge the plan to adopt the previous positive planning that protects the Green Belt first and foremost.

- although the new plan puts great emphasis on need for adequate facilities and infrastructure to support development, this has not been stated in any new wording related to the Horsleys and therefore has failed to address the local concerns and objections. The plan merely presents the prospect that there will be harm to both villages and resulting in harm to the Green Belt itself.

- the plan to allow the density of new housing as still presented in the amendments is still too great and inappropriate for the locality.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3225  
Respondent: 11036801 / Judith Mercer  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8. Policy A42 Clockbarn Nursery
I object to the changed policy A42 Clockbarn Nursery to 60 homes because
- it has ignored hundreds of objections from local people
- it will erode Green Belt in the village to the overall detriment to the openness of Green Belt in the borough
- the need for these houses has not been proven or verified as the housing target has been found to be incorrect, inflated and ignores constraints
- housing need does not amount to “exceptional circumstances” in accordance with NPPF guidance
- the disregard of constraints of roads and risk of overdevelopment after many objections.
- the draft plan should on the contrary put in place protections for this site, to stop inappropriate development, to preserve the amenity of the surrounding area which involves Green Belt. In view of the above I submit that this policy in its present form continues to be misguided and I object to it being in the local plan 2017.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3226  
Respondent: 11036801 / Judith Mercer  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
I object to Policy A43 Garlicks Arch for 400 homes and 6 travelling show people pitches for the following reasons:

- It ignores all the many previous objections by local people.
- There is no proven demand for the travelling show people plots in this location.
- There is no proven need for the houses on this site because the local plan housing target is incorrect, inflated and ignores constraints.
- I object to Garlicks Arch being removed from the Green Belt. National Planning Policy (NPPF) requires exceptional circumstances for Green Belt boundaries to be altered or for development on Green Belt. None have been demonstrated here justifying the proposed boundary changes. The loss of Green Belt here will result in urban sprawl and neighbouring villages merging into one another. There would be harm to openness and permanence to the Green Belt itself, loss of amenity and encroachment on the countryside, contrary to paras 79-80 NPPF.
- This area is at serious risk of flooding. Why has the Council's own flood risk assessment (SFRA) ignored the risks as set out in the environment agency's flood map? This says the site is in a flood zone 3 from a river, which is highest risk category. Yet the SFRA puts it at zone 2. The commissioned assessment is therefore not fit to be relied on to support this policy in the local plan.
- I object to the potential loss of Ancient woodland on the site. The ancient woodland surrounds the site on 2 sides and runs through the centre of the site which includes over 80 ancient oak trees dating back to the year 1600. The proposed development would have a permanent and detrimental impact on this woodland.
- The plan does not provide an achievable strategy for sustainable infrastructure around this site. Roads are already at capacity. The villages of Send and Ripley are suffering severe congestion now, and there is no plan for this to be improved.
- This site has been added to the plan at the eleventh hour, has not been properly thought out, and no infrastructure, including roads, water sewerage, utilities, etc have been planned. This is incompetent and tantamount to neglect on the part of those drawing up this local plan.
- I object to the loss of rural employment on this site. The Policy A43 as it stands threatens the loss of 4 existing successful rural businesses, which have existed for over 30 years, and another 2 businesses for over 9 years both of which support many jobs. They do not wish to lose their premises. They support many in employment.

This policy (A43) is unplanned, contrary to National Planning Policy as specified above and unrealistic. I object to it being in the draft local plan 2017.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** pslp172/3228  **Respondent:** 11036801 / Judith Mercer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
I object to Policy A58 Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment site for reasons below:
- The previous allocation for B1c, B2 and B8 development was removed from the 2014 draft local plan due to all the objections made previously
- there is no need to build industrial or warehouse development in the middle of Green Belt when Slyfield and Guildford still have empty sites and industrial units
- there is no justification for building anymore industrial development in the borough
- the 2017 Employment Land Needs Assessment (ELNA) shows a reduction in demand to 3.9 hectares for industrial land for the entire borough, not a huge allocation of 9.26 hectares at Send in the Green Belt
- It will be contrary to national policy protecting Green Belt by joining up existing villages
- surrounding roads will be seriously impacted causing severe congestion or gridlock
- I am informed that the Aecom research in the ELNA 2017 is of poor quality and lacks sufficient analysis and does not support industrial development in the Green Belt at Burnt Common.
- The mention of possible inclusion of waste management facility at para 4.4.23a lacks enough detail for proper consultation, is inappropriate and I object to this being included
- There is an over allocation of industrial zoning at Burnt Common at para 4.4.23a which hides the possible development of a waste management facility. This is dishonest and deceitful and does not amount to proper planning or consultation. In view of the above I am of the opinion that Policy A58 is also misguided by substandard reports and wrong analysis. It ignores the constraints posed by the Green Belt. Therefore I object to this amended policy. There is no justification for such a development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/1523  **Respondent:** 11036801 / Judith Mercer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**Policy H1 Homes for all**

I object to changes in Policy H1 Homes for all because it has not addressed many of the 32,000 objections.

I object to the deletion of paragraph on density “New residential development is required….Higher density will be supported in Guildford town centre”. This deletion means that GBC have no intention of building at higher density in existing urban areas which is desperately needed.

I also object to the deletion of paragraph 4.2.8 on density as follows “We have a responsibility to use our natural resources, such as land, wisely……height of existing buildings and structures and materials”.

These deletions result in the plan having no density guidelines in the urban area. This is bad and irresponsible planning practice as it fails to exploit development opportunities that urban areas can afford.

I agree to the plan having some forward thought regarding higher density development for homes (not offices) e.g near the railway station area and Ladymead to help regenerate the town.
I object to changes in relation to student accommodation.

Clearly there should be a more robust policy that the University should accommodate 100% of new first year students and more than 60% of existing students on campus. This would free up many houses in the town for families. Surrey University has failed to use its existing planning permissions (dating from 2004) to accommodate 3000 students, or to improve efficient development of its extensive and under used surface car parks. It has 17 hectares of car park and student flats could be built here on stilts with car spaces underneath. If students were accommodated in this way 2000 homes would be freed up in the town and the Hogs Back would not be needed for housing.

I object to changes in relation to Gypsy, Traveller, Travelling show people pitches and plots. GBC already has a higher proportion of traveller sites than most other boroughs similar to Guildford. The over provision is inappropriate bearing in mind other constraints.

In particular I object to the inclusion of 6 travelling show people pitches at Garlicks Arch where there is no proven need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1524  Respondent: 11036801 / Judith Mercer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H2 Affordable Homes

I object to the changes in Policy H2 which still do not go far enough to address affordable or social housing. Affordable homes if one looks at the Guildford property market, and it's not difficult to see, are going to be too expensive for the average local worker/family to afford. They will never be enough proper starter homes or social housing at low rent (like council housing), unless GBC make a conscious effort to try to include more provision for this in their development planning.

GBC should plan for use of existing GBC land holdings, which are extensive, to provide for LOCAL not-for-profit social housing schemes. This would give those such as nurses and teachers in the borough a chance to get a home they can actually afford. I object to the continued planned agenda of GBC through the use of the local plan, to allow for a preference for building executive homes for commuters and Londoners, instead of homes for low income groups e.g children who have grown up in Guildford and want to rent or buy a shared ownership locally. I object again to the “viability clause” which means the policy is unenforceable. This is unacceptable and shows GBC to be “on the side of the developers”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1525  Respondent: 11036801 / Judith Mercer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H3 Rural Exception Homes

I object to the change in Policy H3 Rural Exception Homes.

I object to the deletion of paragraph 4.2.51 "to ensure that housing is secured permanently to meet local affordable housing needs.....in accordance with its published scheme Guildford Home Choice(or equivalent scheme)"

This sadly shows GBCs disregard for local housing need.

Any such policy should be subject to the NPPF constraints for development, particularly related to guidance on unmet housing need.

In conclusion, in view of all of the above, I would ask the Council to reexamine its position regarding the local plan 2017 and to think more deeply about the interests of the borough residents rather than about developers’ ‘pockets.’ I would like all the 32,000 previous objections to be properly addressed.I object strongly to the draft local plan 2017 as it has been presented.Policies conflict and evidence is not trustworthy.The SHMA should be disregarded, as argued in Policy A35 above. I am sad to say the promises of the Council to protect Green Belt in the borough are not in any way born out within Policies through the plan.

The Forward of the local plan 2017 says they will look after special landscapes and adopt a brownfield first strategy, but in the next breath say “in total 1.5% of Green Belt land will be removed and allocated for development.” As already shown above, this figure does not include all insetting of villages in Green Belt, so this is a sham, a pretence to local people that they are preserving Green Belt.It is deceitful.

It has been spelt out by national policy that “unmet housing need( including traveller sites)is unlikely to outweigh the harm to the Green Belt and other harm to constitute the ‘very special circumstances’ justifying inappropriate development on a site within the Green Belt “. GBC has a responsibility to preserve all Green Belt in the borough even the actual 7% it intends to develop(as evidenced in the plan), because this land, Metropolitan Green Belt, represents a national and local asset to be safeguarded in perpetuity.GBC would be able under NPPF guidelines, to more sensibly reduce the housing target as already argued above, to achieve this.

I am appalled by the presentation of the plan where the evidence base has not been scrutinised sufficiently on our behalf so that residents are unable to trust its findings.It is disgraceful that sums of money have had to be raised by residents to obtain expert opinion on the vital matter of population figures and housing need.

For the THIRD time of asking, I would like to see a commitment by GBC to follow national guidance on Green Belt by way of policy throughout the entire plan. It has not done this so far.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1516  Respondent: 11036801 / Judith Mercer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**Policy P1** (Surrey Hills Area of Outstanding Natural Beauty)

Although the policy wording has been significantly amended, I object to Policy P1. The policy weakens the protections offered and unlike previously does not have restrictions on non-major development. This policy therefore is going in the wrong direction. Previously all proposals were considered against the 5 key tests, but now development in the AONB is being made more acceptable. I object to the weaker not stronger protection. It is also contrary to the huge response from the public and the weight of protection in the NPPF. The government guidance for Planning Practice published 21.1.16, from the Department for Communities and Local government states that “The Framework is clear that great weight should be given to conserving landscape and scenic beauty in these designated areas irrespective of whether the policy in paragraph 116 is applicable.” Para 005refID 8-005-20140306. In other words, that should include any proposals of any kind for development including non major. I would like the Council to make certain it includes wording in Policy P1 which states exactly the words in that guidance.

4. Policy A36-A41 East and West Horsley I object to the changes to Policies A36-A41 (East and West Horsley). The potential development sites have been reduced by two (A36 and A41) representing 138 dwellings. This leaves 4 sites which still represent 395 new dwellings. I object to all of these 4 sites remaining for the following reasons:

- they collectively represent in absolute terms, overdevelopment in East and West Horsley and in relation to the rest of the borough this is disproportionate. The many objections from residents have not been heeded, and the imbalance has not been corrected.
- no “exceptional circumstances “or any justification has been given in the plan for this unaccountable imbalance where 70% of all new development in the borough is to be on Green Belt sites.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/1522  **Respondent:** 11036801 / Judith Mercer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

object to Policy P2 Green Belt because:

- It still completely fails to appreciate and acknowledge the importance and permanence of the Metropolitan Green Belt and the fact it has played a major part in planning in London and the Home Counties for a long time and that it needs to be permanently protected. It was established in 1938 under the London Home Counties (Green Belt) Act and then in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were defined in the 1987 Local Plan. It formed part of a 19-24 km belt around London and had very specific purposes, which are enshrined in the NPPF, and reinforced in the local plan. The aim and five purposes of Green Belt are outlined in NPPF section 9 paras 79&80. The Metropolitan Green Belt is a major model of good planning.
-Policy P2 omits any assessment of the value of the Green Belt. It is not just an empty space but is an inhabited working environment that safeguards a certain stock of natural capital. It is wrong for the Council to argue that the plan would involve the loss of “only” 1.5% of the boroughs Green Belt. This is misleading because really the amount is nearer to 7% when insetting, infilling and settlement boundary extensions/alterations are included. GBC have suggested incorrectly that this is acceptable. It is not, as there is no “acceptable” percentage (mentioned in the NPPF or anywhere else) of Green Belt which may be sold. Any amount of the Green Belt is a precious asset to be protected and kept because once it is gone it is gone forever.

-I object to the statement in the draft Local Plan under Green Belt Policy P2(4.3.13) which claims that Send and a further list of 13 villages are “now inset from the Green Belt. This statement is untrue as GBC is proposing to “inset” these villages. No decision has been made by an inspector so therefore the villages remain in the Green Belt.

-I object to the changed “insetting” of 15 villages (including Ripley) from the Green Belt and at “infilling” 12 of the borough’s Green Belt villages.

-I strongly object to the proposal of settlement boundaries being vastly extended in many of the villages, especially in Send and infilling planned for outside the boundaries of 11 further villages. This is unplanned and unmeasured development outside of the Objectively Assessed Need (OAN).

-the local plan should not claim in the Policy for example, that parts of the villages with ribbon development contribute nothing to the “openness” of the Green Belt. This term is not defined by NPPF or in the draft. The Policy appears to be self-defeating by on the one hand saying that it will look after Green Belt land, whilst on the other fails to acknowledge the 5 tests of Green Belt status correctly. It is effectively using this Policy to allow all villages in Green Belt to be vulnerable to large areas of development which would be harmful to the Green Belt, ignoring its very importance to the residents and the borough as a whole.

-It is very short sighted of GBC to look at a village such as Send and conclude that in its “leggy” appearance that it doesn't contribute to the value of the Green Belt. Of course it does because it acts as a vital buffer between Woking and Guildford. It should not therefore be removed from the Green Belt. The village and countryside behind the A247 should all be protected, otherwise the two large towns will link up causing urban sprawl, which would be exactly against the fundamental aim of the Green Belt (para. 79 NPPF).

All other Green Belt villages in the borough are acting in a similar way and should be protected for the same reason, and for the other reasons set out in para 80 NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Policy S2 (Planning for the Borough—our spatial development strategy)
I object to this amended policy and the commitment to build 12,426 homes based on the Strategic Housing Market Assessment (SHMA) prepared by GL Hearn because it has not addressed many of the 32,000 objections to the 2016 version of the plan. I am informed and agree with the opinion that the OAN (objectively assessed need) figure of 12,426 is far too high.

I am very concerned that GBC has adopted this figure as its housing target without applying constraints required by the NPPF and National Planning Policy Guidance (NPPG). I am informed that a study of the GL Hearn report by NMSS has revealed that the SHMA was flawed in its calculation as it was based on incorrect population figures from the ONS (Office of National Statistics). It proposes reducing the figure for homes to 400 per annum. I understand this is justified on the basis of the under recording of students leaving Guildford. The analysis of this has been put to the Council by the GGG (Guildford Green Belt Group) which makes it clear the report by GL Hearn should not be relied on.

I therefore object to the target of 580 homes per year because the GBC has based calculations on over estimated population growth for the period 2015-2034. I object that 70% of sites put forward are still in Green Belt contrary to planning policy. Green Belt is an absolute constraint on housing supply. They have not reduced number required by national guidance available including—

- Exceptional or very special circumstances
- Housing need doesn't justify development in Green Belt
- Government paper on planning for housing gives guide

“Need alone is not the only factor to be considered when drawing up a local plan “including” land designated Green Belt and SSSIs”

“The framework makes clear that once established Green Belt boundaries should only be altered in exceptional circumstances” and “should take into account any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.” (P d055 ref ID.3-045-20141006) 14 June 2017.

I object to the fact GBC has not chosen to apply the government guidelines and has not lowered the housing target because of the restraints which can and should be imposed by them. The guide on housing need came in before the above paper, which said that if the Council is unable to build houses without impinging on the Green Belt then it wouldn't need to build so many houses. The policy S2 specifically goes against the rulings and guidance of national policy and the adopted wording of the draft plan in Policy S1.

In view of the above it would be logical to apply constraints in line with government policy to a revised OAN figure of 50% to account for the fact that 89% of the borough is in the permanent Green Belt, and development is not supported by adequate infrastructure. I am informed that this would be in line with the 50% constraints applied by Woking Borough Council. This would result in a much more acceptable and achievable housing target of 200 homes per annum totalling 4000 over 20 years of the plan. Thus all these homes could be built on existing urban brownfield land, where there is also existing suitable infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/290  Respondent: 11036801 / Judith Mercer  Agent:


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I Object to the above new Local plan and its amendments because the evidence and assessments Guildford Borough Council (GBC) has used are unsound, policies and proposals for development in the borough conflict and do not make sense. Also it does not take account or heed the many (32,000) objections to the previous 2016 draft plan. Much of the proposed sites for development, which are the subject of the majority of objections by residents are within Greenbelt. This is because Guildford and its villages are situated within and constrained by the Surrey Hills and Greenbelt area. The proposals for these sites are ridiculous and unrealistic with regard to sustainability and infrastructure. The size and extent of them would cause harm and destruction and contrary to any benefit to local people. GBC has not taken a balanced approach to housing need between the town and country areas, preferring to focus on and sacrifice Green Belt and countryside instead of proposing more houses in the urban area (towns outside the Green Belt / AONB), which is against government policy. Why is this? Guildford residents including myself have objected to this approach since 2014 and this has been ignored. We are still being ignored. GBC has ignored the National Policy guidelines. Government policy urges development on brownfield sites and the protection of Green Belt and special sites to be paramount. This is laid down in the NPPF (National Planning Policy Framework 2012). There has to be exceptional circumstances for any Green Belt land to be built on or boundaries changed. The fact they have included the ‘Proposed Sites for development’ means that any wording about protecting Green Belt is a sham. They have included policies which have effectively weakened protections of the NPPF, planning 70% new housing in the countryside, 58% in Green Belt and allowing more development in AONB without scrutiny. By definition this is not an exception and there is no attempt to show exceptional circumstances to justify any of either the housing or giving proper weight to protecting Surrey Hills from inappropriate development.

The extent of the housing in Green Belt and the effect of insetting/removal from Green Belt goes contrary to NPPF paras. 87-89. If they are true to their promise (manifesto to be guardians of the Green Belt) GBC should follow the NPPF guidelines. There is unsubstantiated opinion in the plan that there is need for more retail, office and industrial space. The low percentage of residential development in the town centre on the other hand would not work to support the so called demand for office expansion. Are they expecting London and other areas to provide the workforce? This would push up the congestion on our roads and create a demand for more ‘countryside housing’ which the borough does not actually need. The local plan should be planning for the local needs of Guildford not Londoners/commuters to Guildford. The fact is many offices are not being filled and our towns’ shops are constantly changing/leaving. The town needs a proper plan to regenerate the community (not offices/shops) so people can live and work in the town.

**What changes (2016) / further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Policy A26 and paragraph 4.1.9
I object to Guildford Borough Council's changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site which:
• disregards an independent landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England's forthcoming boundary review
• directs more office space to an extended business park (Policy E4), which will increase peak time congestion - particularly around the hospital and A&E - and will also encourage 'rat-running' through residential areas which will also further limit reliable access by public transport
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and questions the viability of the development (2.14a)
• does not appear to address the concerns expressed by Surrey County Council, Environment and Infrastructure Directorate (letter 18 July 2016 to GBC page 9) regarding an appropriate access strategy for the site and the movement of traffic and non-car modes
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for nitrous oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/737  Respondent: 11036993 / Natalie Ollington  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

The increase in housing numbers from 45 to 60 at Site A42 in Tannery Lane will have a significant impact on the already highly congested local rural road network around and within Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/735  Respondent: 11036993 / Natalie Ollington  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()
Housing at Site A43 Garlicks Arch would be on Greenbelt Land.

The potential increase from 400 houses at site A43 Garlicks Arch is extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages.

The inclusion of 6 Travelling Showpeople plots with associated storage facilities is entirely inappropriate in a rural environment within the Greenbelt and there is no identified need within the Local Plan documentation.

The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan and so is out of scale with the proposed development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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The potential for a substantial increase in industrial floorspace from 7,000 sqm to an unspecified amount at the site A58 Burnt Common does not provide local residents with enough information for a full and proper consultation given the ambiguity and lack of detail within the document.

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, tucked away in policy 4.4.23a and does not allow for full and proper consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>PSLPA16/2594</th>
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• Transport evidence is not yet fit for use. The proposed new rail station at Merrow is not well researched.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10766  Respondent: 11037089 / Yan Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I oppose unjustified Green Belt development

• Allowing Green Belt development to pay for transport schemes will simply add yet more traffic from more homes, fuelling congestion.

• I do not think the Plan is ready for an inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10763  Respondent: 11037089 / Yan Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have the following comments regarding the draft Local Plan:

• After reviewing all the information available to me, I support the Guildford Residents Association response and oppose Guildford expanding by a quarter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1714  Respondent: 11037089 / Yan Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2
Having reviewed the new evidence, Guildford’s proposal for more than 12,426 homes and a buffer of 1,155 homes, is excessive and will result in needless loss of Green Belt and green character, and increased congestion, that cannot be justified in our heavily constrained borough.

Allocating too much land for development in the 2017 Plan will also result in Guildford being required to provide homes for Woking on our Green Belt which is folly given the constraints in Guildford, a gap town with constricted roads set in the Surrey Hills AONB.

Even taking account of all the proposals in the 2017 Plan, congestion which is already severe is set to get worse over the plan period.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Table: 16

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<th>Comment ID: PSLPS16/6735</th>
<th>Respondent: 11037153 / Jason Richards</th>
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<td>I OBJECT to the development of 2,000 houses at the Wisley Airfield. The impact on the overloaded infrastructure of the Horsleys would be detrimental. I travel to London by train from Horsley station daily. A journey I have undertaken for the past 15 Years. The increased volume of commuters is astonishing and the station car park is full now on a daily basis. This service could not cope with an increase in commuters coming from a new 'village' at Ockham.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Attached documents:</strong></td>
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I OBJECT to Station Parade being designated a "District Centre". The services and facilities offered at Station Parade have been misread in the report and I am afraid this area could be developed unfavourably in the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/14280</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the 2016 Draft Plan as it has no regard to additional infrastructure - like a new train service from Horsley - or additional drainage facilities which would be needed to accommodate an additional 593 houses in the Horsleys alone.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a resident of East Horsley since 2002, I object to the removal of the Horsleys from the Green Belt. I feel the plan has failed to illustrate that "exceptional circumstances" have been demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/11140</th>
<th>Respondent: 11037185 / Jonathan Parr</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Under no circumstances should Green Belt be built on. Green Belt was introduced for sound reasons and there is no justification to deprive future generations of their benefits.

Sufficient sensible use of brownfield sites is not being made.

There has not been sufficient consultation with local residents or their representative bodies.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to register my strong objection to the Local Plan. My main objections are that there has been no attempt to justify the level of proposed housing. Our roads are already gridlocked and the transport infrastructure cannot support additional traffic. The existing water and sewage infrastructure will not cope with the proposed level of development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPA16/3965</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
General observations in objecting to the local plan:

- There is a lack of primary and secondary schooling in West Horley and the surrounding villages. The Raleigh and Howard of Effingham (both state schools) are already oversubscribed with many local children unable to get places. Local private primary and secondary schools are also full (or near to full) capacity. No provision has been made in the local plan for new schooling or increased facilities for existing schools. With the proposed level of housing, the schooling crisis will be more important than ever, but will continue to remain unaddressed.
- Kingston Avenue Medical Centre serves both East and West Horley, as well as the surrounding villages. It is near impossible to get an appointment within a one week timeslot and further development to the area will make this even worse. Again, there is no provision for new medical facilities in the village, despite an additional 385 homes being proposed.
- Horley train station serves both East and West Horley. It is impossible to park on a weekday and there are no other suitable parking areas in the village. The addition of 385 homes in West Horley, as well as 2100 homes on Wisley Airfield, without increasing the size of the station, or improving accessibility is going to cause immense strain.
- Traffic generation from the proposed new housing in West Horley and the new settlement in Ockham is going to have a significant impact on our roads. Being in a rural setting, every household has at least one to two cars, possibly three. The proposed levels of development are going to cause immense strain on the local roads, already in a poor state of disrepair. Many roads are small, winding lanes, unsuitable for heavy traffic or large loads.

There is a known waste water/sewerage problem in the Ockham Road North / Green Lane area. No provisions have been made to improve the waste water infrastructure, which is deplorable, given the proposed increased housing numbers in the area. Thames Water has advised Guildford Borough that the area’s wastewater network is unlikely to be able to support the demand anticipated from all the proposed developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy i3 Sustainable Transport for new developments - OBJECT:

- The plan states that no provision is being made for improving transport (road, rail, bus etc) in the borough and that the onus will be on developers to propose and secure travel plans for their developments and contribute to transport arrangements. This is totally unrealistic where development and major housebuilding companies are involved and we are going to be left with roads and transport links that cannot cope with the level of use (they are already failing us).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Policies P1 Surrey Hills Area of Outstanding Natural Beauty (AONB), P2 Green Belt and the Countryside - OBJECT:

- Policy P2 states “We will continue to protect the Metropolitan Green Belt against inappropriate development.” I fully object to this statement and this cannot be further from the truth as thousands of homes have been earmarked for greenbelt land.
- I object to the removal of villages (including my home in West Horsley) from the greenbelt by insetting and extending the 2003 Local Plan Settlement Area boundaries. The greenbelt was established to prevent merging of villages and urban sprawl, and by removing tens of villages across the borough from the greenbelt, you are allowing this sprawl to take place.
- No exceptional circumstances have been provided to confirm the need for building on the greenbelt.
- West Horsley and the surrounding villages of East Horsley and Ockham are ones of a rich and varied mix of well established low housing density settlements with a considerable number of historic buildings. Positioned on the north side of the North Downs, partly in the Surrey Hills AONB, it attracts a considerable number of recreational visitors (walkers and cyclists) through the seasons each year. I object to the significant number of new housing proposed for this area as you will damage the charm and rural setting of these villages beyond repair.
- The Key Evidence document ‘Guildford Borough Economic Strategy 2013-2031 makes no case for locating large numbers of homes in West Horsley and the neighbouring villages.
- There are no real plans for increased employment through the proposed development in West Horsley with proposed economic development sites on the opposite side of the borough to West Horsley, making it unlikely that they will be supporting any new developments here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16464  Respondent: 11037217 / Bo Johnson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Policies S1 Presumption in favour of Sustainable Development, S2 Borough Wide Strategy, H1 Homes for all, H2 Affordable Homes - OBJECT:

- Policy S2 states 13,800 new homes are required over the Plan Period from 2013 to 2033. This number of homes is too high and unsustainable in Guildford’s villages.
- Expansion of West Horsley is unsustainable with only one small shop and no post office, with reliance places on the one post office and doctors surgery in East Horsley. It is unsustainable to suggest to a high level of development in the village.
• The development of 385 homes on the 4 proposed sites in West Horley are at much higher densities than are currently present and will be totally out of character with the existing mix of housing. The proposals for the timing of these homes is unsustainable in terms of schooling, drainage, roads capacity, shops, parking in East Horsley (shops and station), public transport as no provisions have been made to improve these.

• No evidence has been provided to substantiate the proposed numbers of housing desired by the plan, both in West Horsley and the borough as a whole. The West Horsley Parish Council and Surrey Community Action Housing Survey carried out in May 2014, identified a limited need for only 20 affordable homes for local people who want to remain in the village, i.e. for young people and for elderly people who wish downsize to a smaller home. Therefore the proposals of 385 homes in the village are out of touch with the true needs of the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1825  Respondent: 11037217 / Bo Johnson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In summary, whilst I understand that development of the Borough is required, this current local plan is totally flawed, unsustainable and will ruin our beautiful countryside for current and future generations. I object in full to the current local plan and feel that a complete overhaul is required. Should this plan be accepted, I can assure you that I will be objecting to every planning application that may come our way that I feel is detrimental to our village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3656  Respondent: 11037313 / Debbie Greener  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Send Village being removed from the Greenbelt on the grounds that Green Belts should be kept open and permanent. We need to preserve the Green Belt for future generations.

To quote the National Planning Policy Framework: "Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider
the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.”

I object to the removal of Send from the Greenbelt on the grounds that once established, Green Belt boundaries should only be altered in exceptional circumstances. There are categorically no proven, justified, or exceptional circumstances to do so.

Also from the National Planning Policy Framework: “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

I object to the removal of Send from the Greenbelt and the proposed development of over 400 houses and 7000 square metres of industrial space at Garlick's Arch, this is a ridiculous proposal how do you expect the local community to accept this? Where will these people send their children to school, go to the doctors etc etc - the local public services are stretched enough as it is.

I object to building 45 houses at Clockbarn Nursery - Tannery Lane is too small to cope with the extra traffic and the junction with Send Road is already very dangerous and cars have to pull out into the oncoming traffic to get out as it is.

I object to the development of 40 houses and 2 travellers pitches at Send Hill. This is beautiful countryside you would be destroying & the access on a small country road is insufficient to say the least.

I object to a new A3 interchange at Burnt Common. The roads around here are already extremely busy already - especially Send Road. The speed the cars go past the school is far to fast and with the two schools merging into one site this will put a lot of children in grave danger. Crossing will be extremely dangerous and are you willing to put these lives in jeopardy?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is with great sadness that I find myself writing this letter. I should not have to defend the Green Belt - it is there to protect our countryside & preserve it for future generations and it is disgusting that you think you can ignore this.

I object to Send Village being removed from the Greenbelt on the grounds that Green Belts should be kept open and permanent. We need to preserve the Green Belt for future generations.

To quote the National Planning Policy Framework: “Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.”

I object to the removal of Send from the Greenbelt on the grounds that once established, Green Belt boundaries should only be altered in exceptional circumstances. There are categorically no proven, justified, or exceptional circumstances to do so.

Also from the National Planning Policy Framework: “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7400  Respondent: 11037313 / Debbie Greener  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to building 45 houses at Clockbarn Nursery - Tannery Lane is too small to cope with the extra traffic and the junction with Send Road is already very dangerous and cars have to pull out into the oncoming traffic to get out as it is.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7399  Respondent: 11037313 / Debbie Greener  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of Send from the Greenbelt and the proposed development of over 400 houses and 7000 square metres of industrial space at Garlick's Arch, this is a ridiculous proposal how do you expect the local community to accept this? Where will these people send their children to school, go to the doctors etc etc - the local public services are stretched enough as it is.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7402  Respondent: 11037313 / Debbie Greener  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a new A3 interchange at Burnt Common. The roads around here are already extremely busy already - especially Send Road. The speed the cars go past the school is far to fast and with the two schools merging into one site this will put a lot of children in grave danger. Crossing will be extremely dangerous and are you willing to put these lives in jeopardy?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7401  Respondent: 11037313 / Debbie Greener  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development of 40 houses and 2 travellers pitches at Send Hill. This is beautiful countryside you would be destroying & the access on a small country road is insufficient to say the least.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3289  Respondent: 11037313 / Debbie Greener  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- The permanence of the open River Way countryside will be permanently lost. Quite clearly that is counter to the key tenets of the NPPF. There are no exceptional circumstances.
- Yet again you are ignoring the clear concerns of local people. Why?
- Tannery lane is not appropriate for the development you seem determined to allow. Why don’t you come and have a look at the narrow nature of the lane (it is a lane) that is wholly unsuitable for the amount of additional traffic that would be generated.
- There is a 33% increase in homes. Why? This ignores the wishes of local people and exacerbates the above problems.
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- It was deleted from the 2014 draft because of all the objections made previously
- The word "minimum" is a change from the previous "maximum" in the 2016 plan and since that time there has been a decline in demand for industrial land
- There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfieldand Guildford still have empty sites and industrial units
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt.
- The impact on small surrounding roads will create traffic gridlock
- It will join up existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/1878</th>
<th>Respondent: 11037441 / Bryan Joseph</th>
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There is no explicit statement of energy use objectives of the buildings. One would suggest a bias to encourage local generation, Combined Heat and Power schemes, Solar Power usage would have also featured in the document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Inset villages and Urban areas have been swept up into a single planning statement. This does not reflect the nature of the so called inset villages as rural environments and completely negates the Green Belt nature that existed in these villages beforehand. I cannot therefore see that these areas are being declared as urban areas and that development of that nature will follow.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1876  Respondent: 11037441 / Bryan Joseph  Agent:

My comments relate to Horsley and Effingham Junction Stations.

Effingham Junction station is an interchange as it connects local buses and two train lines. Whilst its usage is lower than that of Horsley, according to the National Passenger Survey numbers and the number of Season Tickets originating at the station, it is well used by the population of Bookham and Effingham and it is within 0.5km of its own parade of shops including a Dental Surgery and a Goods Yard for special purpose railway equipment. It is also used by three local paintball facilities and by staff and others accessing the Drift Golf Club. It does not seem to reflect conjoined thinking if you are planning 2000 homes at Wisley and then not considering its nearest local station as an interchange. If that development should occur then it clearly will be.

Horsley is an interchange and we note the plans for further development at Ockham Road North and also in West Horsley. Some consideration should be given to the needs of the Parish in defining how this interchange is developed in the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

No mention of cycle storage in the document. Secure storage other than at stations would encourage the use of cycles within the communities concerned.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I note the plans to remove or to use the polite phraseology adopted within the plan to 'inset' a number of villages from within the Green Belt. I can see no justification for this. The Green Belt is designed to protect such rural villages from development or over-development. The rural villages each have their character and have managed their development locally. While I recognise that the Green Belt is a living and Breathing artifact, there is no need for the creation of a 'free for all' with respect to in-fill and multiple fill development that will occur within the settlement areas of the villages once the green belt protection is removed. The nature of the villages, and in particular East Horsley where I live, is rural and
peaceful. Its infrastructure is already strained with its existing population. I do not foresee affordable housing or even housing that takes into account the needs of an aging population or the increasing shift to mobile and other forms of work being served by the removal of the village from the Green Belt. This is especially disturbing with the presumption in favour of development that is mentioned in Section 1 of the plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1873  Respondent: 11037441 / Bryan Joseph  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )  

Answer (if comment is on questions 1-7 of the questionnaire): ()  

I am concerned that you make the assertion 'Exceptional Circumstances Exists inset villages from the Green Belt' without any description of what those are. Anyone can make an assertion, it is the supporting evidence that provides the justification and having read the plan I can find no supporting evidence that has been presented.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1874  Respondent: 11037441 / Bryan Joseph  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )  

Answer (if comment is on questions 1-7 of the questionnaire): ()  

As a supplementary to my previous comment, the council says that its policies will be outlined in its forthcoming Green Belt Supplementary Planning Document. No-one can support a plan on the basis of Trust Me - I will write something sensible. Furthermore, having 'inset' the villages from the Green belt the policies will not apply. The situation is perverse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1875  Respondent: 11037441 / Bryan Joseph  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3  

Page 647 of 2855
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Having read the plan and the fact that there is a clear bias for urban development in Ash, I cannot see the logic of creating a small Green Belt to protect Ash Vale.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1871  Respondent: 11037441 / Bryan Joseph  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The comments appear to have been developed without recourse to the local plans in each area. With a single plan being approved, it appears somewhat perverse that it asserts localisation and consultation with local parish councils. Furthermore, as far as I am aware, the plans for the Wisley Airfield have received widespread condemnation and are subject to a rethink. The objections included air quality as well as traffic and failure to cater for adequate infrastructure, including transport and schools. It is, however, presented as a fait accompli herein.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3719  Respondent: 11037921 / C. H. Morris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 648 of 2855
Fourthly, the quantum of additional dwellings proposed for the Horsleys will place an intolerable burden on local amenities – even with the current level of housing we were unable to obtain places in the local schools for our children when we returned from a period working abroad and it is routinely impossible to park at local shops. Only in the last week there was a serious car accident in East Horsley in the narrow road that traffic uses when exiting from the shops, and accessing the village hall, medical centre and playing fields. Frequently the latter area has so many cars parked on pavements etc. that disabled people are unable to pass along pavements with their small vehicles.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3717  Respondent: 11037921 / C. H. Morris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Secondly, the proposal to remove the Horsleys from the green belt appears disproportionate to the documented need for additional housing. Whilst, there is clearly some potential for limited development within the two villages, this needs to have the current level of scrutiny of new planning applications, if the essence of the local environments is to be maintained.

Thirdly, removing the green belt will make it too easy for builders to develop relatively low cost agricultural sites rather than more expensive brown fields or more innovative options such as building over the urban sections of the A3 and railways.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3720  Respondent: 11037921 / C. H. Morris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Fifthly, we are already subject to a degree of flooding following periods of rain and I am most concerned that further building will create serious flood risk for properties in these villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Finally, I believe that the current “salami slicing” tactics will result in the end of the competitive advantages that Surrey has over the other counties that border London (and indeed the areas around other capital cities across Europe). A more strategic approach is needed that will create the housing needed in much larger developments. Developments that will include new houses, medical and shopping centres and modest office accommodation in the way that was achieved with the Goldsworth Park development outside Woking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I am writing to formally object to the Guildford Local Plan.

Firstly, the basis on which the target number of new houses is unclear. I have seen no evidence that the assumptions in the Strategic Housing Market Assessment (SHMA) have been challenged or validated in any transparent way. Moreover, in our new context of much reduced expectations for growth following the decision to leave the EU the assumptions in the SHMA need to be revisited.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the policies providing for the insetting of certain villages in the borough & in particular to the insetting of Effingham village where I have been a resident for the past 28 years. I believe the relevant policies are P2 (Green Belt-Page 48) & D4 (Development in urban areas & inset villages-Page 106).

The comments that follow are specifically directed at the policy to inset the village of Effingham but could also apply to the other inset villages.

Policy P2 states that “We will continue to protect the Metropolitan Green Belt …………against inappropriate development “.

However, in the introduction (para 4.3.13), it states that 15 villages will be inset. I fail to see how this is protecting the Green Belt.

In para 4.3.16 it states that “exceptional circumstances “ are required to amend Green Belt boundaries. But there is no attempt to demonstrate what these exceptional circumstances are; instead there is a just a statement that GBC consider that they exist.

The inference from para 4.3.12 is that Effingham no longer makes an important contribution to the openness of the Green Belt. But there is no justification of what has changed to demonstrate exceptional circumstances.

In para 4.5.50 (part of reasoned justification of Policy D4) there is a reference to development in villages being very limited & historically development has been focussed in the urban areas of Guildford & Ash & Tongham only. But again there is no explanation of what objective data this is based on. If you look at the Census’ of 2001 & 2011, the growth rate of housing in Effingham (washed over by the Green Belt) is higher than Merrow (part of the urban area of Guildford), which is not washed over by the Green Belt. Furthermore, the rate of increase in housing stock in Effingham during this period is faster than the average for the borough.

The overriding theme running through the report is that there is an unmet housing need & that this cannot be met by building in the urban area of Guildford alone & therefore villages previously washed over by the Green Belt need to be inset.

To determine which villages should be inset, GBC appear to rely on the work undertaken by Pegasus & contained within their Green Belt & Countryside Study. Having reviewed this study, I believe that the methodology adopted is subjective & contains incorrect conclusions. There are many areas of the study that I believe are flawed but I have just focussed on the main areas below.

In stage 1 of the methodology (assessing the openness within each village), Pegasus continue to use the concept of a “perceived village area” to justify the inclusion of housing that is in Mole Valley but in turn have not included open areas such as Rolls Farm thus distorting their analysis. The perceived village area also ignores actual boundary markings along the A246 so it is very subjective. Their housing density analysis is not an objective approach to measuring housing density. They do not use a numerical guide which would be more normal. So, for example, they describe as high density the two storey detached residential development located on Effingham Common Road with medium to large garden plots enclosed by Thornet Wood to the east. The Google earth snapshot of this area clearly shows that this cannot be regarded as high density. Nor are the houses enclosed by Thornet Wood. The actual density of housing in this area identified is 3.5/acre or 8.6/hectare. This simply cannot be regarded as high density.

Of the 14 areas identified on the stage 1 map, Pegasus identifies 3 as high density (but with no numerical justification), 7 as medium (again with no numerical justification), 3 as low & 1 as open farmland. Browns field & KGV playing fields are classed as low density. A detailed analysis of the area covered shows that the Pegasus analysis is wrong. Furthermore, Pegasus concluded that as 3 were high density the whole of the perceived village area exhibited a high density of development. This is an incorrect conclusion & cannot be relied upon.
In their Stage 2 analysis (assessing the locations of potential Green Belt boundaries), Pegasus ignore the NPPF requirement to define boundaries clearly using physical features that are readily recognisable & likely to be permanent. They continue to use treelines, hedgerows & woodlands to derive new boundaries. This simply cannot be regarded as likely to be permanent. Furthermore, some of the features used continue to be in Mole Valley.

In summary, the Pegasus study is flawed. Effingham is an open village with a great deal of open space within the village. To suggest otherwise is a distortion of reality. Furthermore there are strong connections to the Green Belt beyond the village & accordingly the village makes an important contribution to the openness of the Green Belt.

In conclusion, for the reasons stated above, I object to the insetting of the village of Effingham.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Building 2000 homes on the former Wisely Airfield site is the wrong place to build a new town/village. Where are these people expected to work? Most will have to commute which if by car will add further congestion to the already congested A3/M25 and local roads, not to mention an increase in green house gases and pollution — hardly an environmentally friendly option. If they commute by train which station are they supposed to use? Horsley & Effingham Junction station car parks are already over-flowing on week days.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Designating Station Parade in East Horsley as a district centre is a joke. The current shops are only suitable for ad-hoc shopping. Most residents travel to Cobham or Burpham or further for super-market shopping. The car parking in and around station parade is already close to capacity. The Medical Centre is also at capacity with difficulties now in obtaining a timely appointment, and parking is an issue also at the Medical Centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15398  Respondent: 11039041 / Robert Foreman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The roads in the Horsleys are narrow, many without pavements, and not suitable for increased traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2679  Respondent: 11039105 / Robert and Judith Warren  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the draft local plan for a number of reasons set out below related to the Horsleys

- **Green Belt:** The Plan does not justify the “exceptional circumstances” as required by the NPPF to remove areas of Horsley from the Green Belt by changing settlement boundaries.
- **Infrastructure:** The local infrastructure is already overloaded and no planning thought appears to have been given to the provision of additional roads, schools, medical facilities and drainage/sewerage.
- **District Centre at Station Parade:** This is inappropriate given the nature of the facilities in the village.
- **Ockham Three Farms Meadow:** 2000 isolated houses are proposed there. There are many arguments for objecting to this site being in the Plan at all given that a planning application has already been rejected, however the development will have a considerable negative impact on the Horsleys particularly if the promised infrastructure facilities do not materialise, as is often the case under “viability” pressure from developers.
- **Disproportionate housing development in Horsley:** The planned allocation of housing in the Horsleys is utterly disproportionate to the size of the village – a 35% increase in existing West Horsley households and on Green
Belt land. This compares to 11% increase in Guildford Town where opportunities for brownfield development remain to be explored. A fairer and balanced allocation of new housing is required.

- **Suspect basis to the numbers of houses required**: There remains considerable suspicion that a flawed model has been used for the estimation of numbers. Suspicion sustained by the lack of openness of the model used for the calculations – this model has not even been exposed to the GC councillors. Particularly in the light of Brexit, these numbers require justification and revision.

I OBJECT to the Draft Plan and request that it is radically redrafted to account for existing law, national policies and the wishes of current residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Disproportionate development in the Horsleys

**I object.** The planned allocation of housing in the Horsleys is utterly disproportionate to the size of the village – a 35% increase in West Horsley properties and on Green Belt land. This compares to an 11% increase in Guilford Town where opportunities for brownfield development remain to be explored. A fairer and balanced allocation of new housing is required. These proposals will destroy the rural character of the villages. This is at least unfair and feels persecutory, particularly when the west of the Borough (Ash and Tongham) is allocated so few properties. The cumulative effect of so many houses on the Horsleys must be taken into account. If there are reasons for the current allocation of housing, these should be argued and justified in the Plan rather assumed. The density of new housing on the proposed Horsley sites is inappropriate, and greater than anywhere in the locality.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Three Farms Meadow (Ockham)

I object. 2000 isolated houses are proposed there in another disproportionate development. There are many arguments for objecting to this site being in the Plan at all given that a planning application has already been rejected on 14 separate grounds, however the development will have a considerable negative impact on the Horsleys particularly if the promised infrastructure facilities do not materialise, as is often the case under “viability” pressure from developers. This site should never have made it into the Draft Plan published after the recent planning decision. There seems to have been no consideration of the cumulative impact of this site and the excessive development proposed in the Horsleys and further review is required.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11164  Respondent: 11039105 / Robert and Judith Warren  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Infrastructure (Policy I1)

I object. The Plan is imbalanced. The significant numbers of housing estates, particularly in rural areas are unsupported by a commensurate infrastructure investment. For the Plan to work and to prevent isolated populations overstretching existing strained resources in transport, educational, medical, energy, water, sanitation and communications, there needs to be significant further consideration of the supporting infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11162  Respondent: 11039105 / Robert and Judith Warren  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
**Sustainability and the Green Belt (Policy P2)**

**I object.** The Green Belt is a highly valued asset and we are the custodians of it for today and future generations in the South East and London. Long-term sustainability is critical to such an asset and the draft Local Plan does nothing to uphold the Green Belt. Rather by stealing from the Green Belt to add settlement areas the Plan undermines Green Belt principles. The Green Belt is a covenant to protect the area in perpetuity not to be eroded for short-term gain.

- The Green Belt should be a cornerstone of local planning policy.
- The Green Belt cannot be replaced – once it is gone it is gone forever.
- It should not be in the gift of the Council to give away this asset that belongs as much to Londoners and the whole nation as to the people who live in it.
- The Plan does not assess the loss associated with taking Green Belt land; its working environment and its natural capital including flood control biodiversity, open space, rural views etc. as well as benefits to health and wellbeing.
- The Green Belt is protected by law and national and local policy. The Plan needs to recognise this.

All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/11161  **Respondent:** 11039105 / Robert and Judith Warren  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**General objections**

**I object.** Overall the Draft Plan does not appear to be well thought through or reliably evidenced. There is an opportunity for the Plan to lead the way in sustainable policies and brownfield development which it completely fails to do, preferring instead to use green field sites which maximise short term profit for developers at the expense of others.

To be clear I do not object to housing development per se. The rising population must be accommodated. However, **I do object** to Guildford Borough having more development than surrounding boroughs and to disproportionate green field (and Green Belt) development being proposed when options for brownfield development in urban centres with appropriate supporting infrastructure have not be fully explored.

There is a housing need for lower income earners, and social housing for others including vulnerable persons. The Plan does nothing to address this and everything to support the development of larger homes that are unaffordable to these groups: the developer profit motive appears to have disproportionately influenced the Draft Plan. **I object** to this approach which must change.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Calculating the overall number of houses needed (Policy S2)

I object. The Plan must revise the number of houses required, probably considerably downwards, in the light of the referendum decision to leave the EU. Even if there was no Brexit, the number of houses proposed by the plan fails to take account of the geo-location of Guildford Borough with adjoining population centres and the transport links to them. The number developed does not account for adjacent boroughs such as Rushmoor and Mole Valley, nor the Impact of the London commuter populations. Better market data should be sought to provide a reliable basis to the Plan. The resulting Plan shows lopsided distribution of new housing with adjacent neighbours developing far less and Guildford Borough more. The absence of objective scrutiny on the consultant’s assumptions and projections removes confidence in this Plan as a basis for future housing development in the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I wish to object to the above plan in relation to “The Horsley’s Development Sites”.

My reasons for this are as follows:-

- Whilst some development of new housing, assuming a broad mix of affordable through to upper end, is desirable to meet demand the proposal for up to 593 new dwellings in the Horsley’s is out of balance compared to the existing housing stock.
- No justification of the “exceptional circumstances required” has been established within the local plan to remove the Horsley’s from the Green Belt.
- Development outside the existing settlement boundaries should only be considered once all suitable sites within the current settlement boundaries have been utilised.
- The local plan does not provide an infrastructure proposal to support even a modest increase in housing stock. For instance the Horsley Medical Centre is close to capacity and would not be able to accept registration for new patients on anything like the scale proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

'Protects our most important countryside, landscapes and heritage' - How does removing the protection of the green belt and building large number of houses safeguard our countryside and landscapes? If the plan allows the green belt to be eroded, how can it be stopped long term as the precedent is set. The recent proposals for developing Newlands Corner show the Council have a complete lack of understanding of what it means to protect the countryside (and I do not understand how the council could account for the financial figures it gave for its upkeep!). Also, the heritage of our separate villages is to be replaced by conglomerates of housing areas 'wear away our most imyortant countrysidce, landscapes and heritage' is a better description of this plan.

In particular, I object to the removal of West and East Horsley from the green belt, changes to the boundaries and the large number of houses proposed to be built. There are no exceptional circumstances for this change to the green belt. The disproportionate number of houses planned is a huge increase in density for our village and exacerbates the chronic issues of , school places, surgery appointments , drainage and substandard roads. Also, Horsley railway station would have problems dealing with the increased demand and there is not enough parking in the area. Furthermore, the type of housing proposed will not address the true housing needs but will totally change the character of our village. The plan is unsustainable and destabilizing. In view of recent events, I hope the Council will really start to listen and act on views of its residents and perhaps find the true meaning of 'sustainable'.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I **OBJECT** to the New Local Plan which has ignored the issues and concerns raised in my previous objection to the last plan. For example, the housing plans for developing Ockham (Three Farms Meadows) have been proved to be unsuitable for the area and rejected by Guildford Borough Council yet it appears in the New Plan as a strategic site which allows it to be considered for housing development more easily in future.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/4669</th>
<th>Respondent:</th>
<th>11039297 / Juliet Bradshaw</th>
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</table>

'Focus on sustainable growth' - there is nothing sustainable in this plan. Land in the green belt is to be lost and the huge number of houses proposed for our area will adversely affect and degrade the environment and lead to more pollution. How can a 35% increase in housing for the Horsleys be considered sustainable? 'Focus on substantial growth to the detriment of the environment' is a better assessment.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/4670</th>
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</table>

Addresses future housing, employment and infrastructure' - There is no guarantee that this plan addresses future housing as it does not provide truly affordable housing. Affordable housing in our area is a mockery as these houses are priced at £750,000 plus, which is well out of the reach of the young and people on medium incomes. The need for Council homes has been ignored. Possible employment opportunities are being reduced in our area such as the local camp site which is likely to be replaced by a housing estate. Plans for infrastructure have been kicked into the long grass and there will be a breakdown in services as the infrastructure is not fit for purpose now. 'Ignore future housing, employment and infrastructure needs' is the plan's proposal for West Horsley.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/2251</th>
<th>Respondent: 11039681 / Bruce Jeffreson</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently outside their financial capability.</td>
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<td>The methodology is also flawed as this plan has been formulated without regard to village Neighborhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
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<th>Comment ID:</th>
<th>PSLPS16/4828</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 Gosden Hill as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt, which will see coalescence and urban sprawl from Burpham to West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPS16/4829</th>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID:</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to new sites (Garlicks Arch) being introduced as an afterthought when it was not even considered in the previous plan. A slip road on the A3 at Burnt Common has been added to the Draft Local Plan without Highways England consent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4830  Respondent: 11039681 / Bruce Jeffreson  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of strategic site Policy(A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local community. This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4831  Respondent: 11039681 / Bruce Jeffreson  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy A43a, the proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4832  Respondent: 11039681 / Bruce Jeffreson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4833  Respondent: 11039681 / Bruce Jeffreson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9161  Respondent: 11039681 / Bruce Jeffreson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT to 2016 Draft Local Guildford Plan</td>
<td>I object to a totally unrealistic number of houses for the country lanes to absorb.</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burtt Common, Send and East/West Horsley</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
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</table>
I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10136  Respondent: 11039681  / Bruce Jeffreson  Agent:

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9394  Respondent: 11039681  / Bruce Jeffreson  Agent:

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/1088  **Respondent:** 11039681 / Bruce Jeffreson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removal of Brownfield site (A34) from the Plan

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/1087  **Respondent:** 11039681 / Bruce Jeffreson  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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I object to removal of Brownfield sites (A4) from the Plan

Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

---

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/1087  **Respondent:** 11039681 / Bruce Jeffreson  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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I object to the increase in housing proposed in Tannery Lane (site A42)

This has been increased by a third since the 2016 version of the Plan. This will have a significant impact on the already highly congested local rural road network around Send. This is in contradiction to section 2.14a of the Plan which states "Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays.” And yet there is no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/1087  **Respondent:** 11039681 / Bruce Jeffreson  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
I object to the extended development in the Green Belt (Policy P2, Site A43)

I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

1. I object to the allocation of 6 Traveling Showpeople sites in A34 Garlick’s Arch

The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlicks Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.

I object to the potential and ill-defined increase in housing allocation at A43 Garlick’s Arch

The potential of an increase from 400 houses at site A43 Garlick’s Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/1085  **Respondent:** 11039681 / Bruce Jeffreson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the unfair imbalance of the Plan across the borough.

With the removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan has become even more biased against the North East of the borough. Guildford Borough is over 100 square miles. Of the 11350 homes proposed in the Plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/1084  **Respondent:** 11039681 / Bruce Jeffreson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A50

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Plan is self-inconsistent in respect of traveller sites.

A50 Whittles Drive, Normandy, shows on the Site details: “Allocation: The site is allocated for approximately 14 Travelling Showpeople plots …” Clearly A50 more than covers the total "need" of 8, (page 40, 4.2.22.) and so no “need” exists for this in site A43. This and other inconsistencies in the Plan mean no decision can be made on the basis of this document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/1086  Respondent: 11039681 / Bruce Jeffreson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The inclusion of site A58 Burt Common, removes the need for A43 Garlick’s Arch) GBC’s own reasons for including Garlick’s Arch A43 in the 2016 version were

Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (which are almost contiguous) are in the plan; therefore GBC are not following their own guidelines and objectives.

Since A58 Burnt Common is now in the Plan (2017) more than the “required” industrial space is available there, so there is no reason for Garlick’s Arch to be included.

I object to the proposal for a Waste Management Facility in Green Belt (A58)

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/196  Respondent: 11039681 / Bruce Jeffreson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the lack of proper infrastructure planning for sites (A43 and A42).

The Foreword to the plan by Paul Spooner includes on page 5:

"We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan”.

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/202    Respondent: 11039681 / Bruce Jeffreson   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object removing Send Business Park from the Green Belt (4.3.15).

Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3284    Respondent: 11040193 / Jill Stevens   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I strongly object to the building of 400 houses and industrial development at Garlicks' Arch. The area is marshy and the woodland is particularly endangered, with very old trees which must be preserved. The traffic, particularly at rush hour times, which is dreadful, will be vastly increased in this area and the infrastructure at present is at bursting point. Our doctors and schools will be unable to accommodate the vast new numbers of residents in this area, if development goes ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3285  Respondent: 11040193 / Jill Stevens  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to a new interchange with the A3 at Burnt Common. This already congested and extremely busy area would be absolutely overloaded with traffic from the proposed building of huge housing numbers locally, and would see Send become extremely busy and gridlocked, with increased noise and pollution levels in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7250  Respondent: 11040193 / Jill Stevens  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Having lived in Send Marsh with my family since 1972, I have seen first hand how the schools, doctors and roads, have gradually become overloaded over the years, to the point of bursting. It is inconceivable that as a Planning Team, none of the infrastructure issues have been addressed, even though national guidelines state that development must be proportional to its locality.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7249  Respondent: 11040193 / Jill Stevens  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
I strongly object to the proposal to remove Ripley, Send, Wisley and Clandon villages from the Green Belt. The intention was for green belt to be permanent and allow for open space and a natural environment to prevail and not for more houses, which will create the joining of villages into a wider urban existence. Development will become inevitable and our rural villages will disappear for ever. 'Inset' of our villages must not happen, development should be on brownfield sites only.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I strongly object to the new Local Plan for the following reasons:

1/ Adequate infrastructure is not in place to accommodate these developments and no provision has been allowed for such – particularly roads and waste. The local roads cannot handle the current traffic numbers – without significant investment in alternative road systems the local area will become completely clogged with traffic.

[...]

4/ I support a tunnel from Send to Compton that takes the through traffic on the A3 away from our local roads. I also support a four way junction at Send or Potters Lane with a direct route through to Merrow. I also support a four way junction at the A3/A320 in Guildford so that A3 traffic have direct and improved route through to Woking

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
2/ Where is the evidence to prove that we need so many houses in our area?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1161  Respondent: 11040449 / Rosalind Pollock  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3/ I disagree strongly that building should take place on the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/285  Respondent: 11040449 / Rosalind Pollock  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5/ I think there needs to be an extended consultation period to address the above critical issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3783  Respondent: 11040481 / D G Spratt  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

1. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The housing numbers proposed are for nearly 14,000 homes over 15 years from 2016 to 2031. This number is too high. The model used to calculate the number has not been seen or the assumptions tested by the council or any of its officers. It has been, on numerous occasions shown to be flawed by various 3rd parties. This housing target will result in the borough’s permanent resident population increasing at **4.5 times the rate of population increase during the period 2001 to 2011.** This population growth, by definition, is excessive and unsustainable for a gap town with many environmental, physical and infrastructure constraints.

Over 70% of the proposed housing is planned for land currently in the Green Belt. Housing need is not a reason in law for protected green belt land being used. It is perverse for so much housing to be planned for the green belt. Clearly, the green belt has not been used as a constraint as clearly set out in Government advice, planning policy guidance, the NPPF, case law, election manifestos and Ministerial letters to MPs.

For West Horsley this is reflected in a 35% increase in the number of houses within 3-5 years of a plan being adopted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. I object to the expansion of commercial land in the urban area losing the potential for further housing. Policy E7: Guildford Town Centre

There is no reliable evidence provided that the retail core of the Town Centre can support expansion of 45,000 sq m of additional retail space at North Street.

Online retail is set to account for 21.5% of total retail sales by 2018 from 12.7% in 2013, the highest online retail share in the world according to the Centre for Retail Research. March 2016, online sales rose 12.3%, and it was the third consecutive month in which more than 20% of all non-food shopping took place online, (British Retail Consortium and accounting firm KPMG) With such a high retailers will need just 70 high street stores to create a national presence compared to 250 in the mid 2000’s. An expansion on such a scale is negligent when the Council claims to be in such desperate need for housing.
Retail is a declining industry and should not be invested in by the Borough at the expense of housing in the most sustainable urban location, near employment and transport hubs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15976  Respondent: 11040481 / D G Spratt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy II)

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages. There is too much traffic in our villages already and this plan will cause more congestion in West Horsley, East Horsley, Normandy, Ockham, Ripley, Send and Clandon, with no plan to improve that. The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses in such a small area means dangerous and unsustainable traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15982  Respondent: 11040481 / D G Spratt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. DRAINS, WATER SUPPLY, FLOOD RISK, CONGESTION

Our drains, our water supply, our medical facilities and our roads cannot cope with the proposed number of new homes. Building this number of homes will lead to flood risk here and downstream (along the Wey and Thames). The planned development on Green Belt is therefore unsustainable. I must ask you to revise the housing number, and to amend the Local Plan to utilise brownfield land rather than green fields sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/15978  Respondent: 11040481 / D G Spratt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Under the current economic climate post Brexit, it is unlikely any additional funding will be made available for new capital projects. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15977  Respondent: 11040481 / D G Spratt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to poor air quality concerns (Policy I3)

The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health. It has been shown that Wisley already has NOX levels above the EU legal limits and by law a school cannot be located in this area as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15975  Respondent: 11040481 / D G Spratt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to not protecting the Green Belt (Policy P2)

Our Green Belt is precious. It is what protects London from urban sprawl; it preserves air quality; it prevents flooding; it is the city’s playground. It is for us to conserve and protect it. There are 5 legal purposes for Green Belt, and it meets them all:

- To check the unrestricted sprawl of large built up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

This policy is flawed and should have been amended. In the last consultation just six individuals, out of the c. 7,000 of those who took part in the consultation, supported the policy. Another 20 comments of support were from organisations such as: the University of Surrey, local councils (including Guildford), consultants (e.g. Savills) or landowners. But of the 1,371 who commented on the green belt policy 1,332 (97%) were against.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/15980</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. NO EXCEPTIONAL CIRCUMSTANCES

I object to the methodology of drawing up the plan also it appears that they have not taken into account the Surrey County Council highway planners’ views and the real risk of flooding in the area and the costs involved in improving the existing infrastructure. Furthermore, the plan has been formulated without regard to village neighbourhood plans. There should have been extensive consultation before removing the affected villages from the Green Belt, particularly the villages affected neighbour National Trust sites and Areas of Outstanding Natural Beauty such as the Sheepleas and Ranmore Common.

The local plan proposes nearly 9000 new homes to be built on Green Belt land (compared with ~ 5000 current homes in Guildford, so approx. equal to 18% of the existing homes in the borough) – a huge proportion. The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. Unmet housing need is NOT an exceptional circumstance in law. No exceptional circumstances have been disclosed. So the Green Belt boundaries should NOT be changed through the plan making process.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/15974</th>
<th>Respondent: 11040481 / D G Spratt</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)

The number of new houses proposed is not sustainable – it will damage local communities by over development, particularly in West Horsley, East Horsley, Normandy, Ockham, Ripley, Send and Clandon. It is patently clear that the road and train network will not be able to cope with such an increase in usage and will lead to hazardous conditions for all.

The development should be in urban areas where there is sustainable transport. West Horsley for example will see the number of housing increased by 35% within 3-5 years of the plan being adopted. The number and density of housing is not in keeping with the local area and is therefore against policies within the The National Planning Policy Framework (NPPF).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **BROWNFIELD AVAILABLE**

There is brownfield land available in the town centre which is being earmarked for commercial development rather than for housing. This is enough to meet our real needs for affordable local homes. There are enough vacant commercial sites to cope with genuine business need, and we have enough retail capacity already, so urban brownfield/derelict land should be used for housing.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/1565  **Respondent:** 11040609 / Simon Long  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/2974  **Respondent:** 11040609 / Simon Long  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 Gosden Hill as being totally a inappropriate and unsustainable development of 2000 homes in the Green Belt which will cause coalescence and urban sprawl from Burpham to West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/2968  **Respondent:** 11040609 / Simon Long  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2941  Respondent: 11040609 / Simon Long  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of strategic site Policy A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2948  Respondent: 11040609 / Simon Long  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy A43a, the proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2962  Respondent: 11040609 / Simon Long  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2956  Respondent: 11040609 / Simon Long  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6410  Respondent: 11040609 / Simon Long  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Guildford Borough Proposed Submission Local Plan (June 2016) as this plan is unsound, unsustainable, unworkable, flawed and in many instances, unnecessary for the reasons set out below:

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by over development in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/6422  Respondent: 11040609 / Simon Long  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4027  Respondent: 11040705 / Patricia Cullimore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO THE WISLEY AIRFIELD SITE STILL BEING ON THE LOCAL PLAN. The idea of 2,000 new homes is unreasonable and totally unsustainable. Are you able to produce proof that all this housing is required in this area? I think not.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4023  Respondent: 11040705 / Patricia Cullimore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

I OBJECT TO THE WISLEY AIRFIELD SITE STILL BEING ON THE LOCAL PLAN. The idea of 2,000 new homes is unreasonable and totally unsustainable. Are you able to produce proof that all this housing is required in this area? I think not.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<th>Respondent: 11040705 / Patricia Cullimore</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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<td>I OBJECT TO 400 homes and 7,000 sq metres of industrial space at Garlick’s Arch opposite the end of my road. This Green Belt site is should not be used when there are other spaces that can be used. Slyfield is already a site for industry and is a more appropriate area for the proposed industrial space. It is totally out of order to mix industrial space with a residential area.</td>
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<td>I OBJECT TO A NEW INTERCHANGE WITH THE A3 AT BURNT COMMON. If this is built the traffic would go through Send and Send Road is already heavily overloaded and the area would become gridlocked. Noise and pollution levels, which are already excessive, would worsen in a residential area. This must be avoided at all costs.</td>
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<tr>
<td>I OBJECT TO 40 HOUSES AND 2 TRAVELLERS’ PITCHES AT SEND HILL.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Comment ID: PSLPP16/8523  Respondent: 11040705 / Patricia Cullimore  Agent:</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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I OBJECT TO SEND VILLAGE, RIPLEY, WISLEY AND CLANDON BEING REMOVED FROM THE GREEN BELT.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/8522  Respondent: 11040705 / Patricia Cullimore  Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I’m not sure where Guildford Borough Council think they are coming from these days. Instead of trying to preserve this beautiful area you seem hell-bent on destroying it with overcrowding and chaos on the roads. There are so many areas in Surrey that could be used to house people without cramming them into this area. Therefore

I OBJECT TO THE 2016 DRAFT LOCAL PLAN which is not sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp172/3852  Respondent: 11040705 / Patricia Cullimore  Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I object to the increase in housing proposed in Tannery Lane (site A42) especially proposing that there be an increase from 45 to 60 homes. Are there also proposals to help with the increased build-up of traffic? Building these houses will destroy the beautiful open countryside and increase the risk of flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3850  Respondent: 11040705 / Patricia Cullimore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the extended development in the Green Belt (Policy P2, Site A43) Garlick’s Arch. Because why should you build on this beautiful Green Belt site, which already has sufficient houses in the area, when there are plenty of more appropriate sites around the Guildford area where there would be less overcrowding? We already experience a great deal of traffic at certain times of the day and building here will just add to the congestion. I was at risk of being flooded in 2000 and am concerned that the infrastructure will not support additional building and will increase the threat of flooding again in the area.

I object to the allocation of 6 Traveling Showpeople sites in A34 Garlick’s Arch There have been travellers using the fields behind my house over the last 12 months and they have left the fields in a dreadful condition.

[Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]

It will take a great deal of money to restore the land to its former use for agriculture.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3851  Respondent: 11040705 / Patricia Cullimore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Land at Burnt Common, Policy A58  I object to this being used as an industrial site or potential for a Waste Management Facility because there is already sufficient industrial units at Slyfield and Guildford which are empty and there is absolutely no need to build additional units, especially so close to housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp17q/366  Respondent: 11040705 / Patricia Cullimore  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have already objected to the proposed 2016 plan and now you have come back with another plan that is even worse. Will you take notice this time or keep going until we submit to what you appear to want? Your current proposals are completely unacceptable and so again I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2017) and in particular to the changes which will affect my home in Ripley and also in Send, and destroy my reasons for buying a property in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2240  Respondent: 11040737 / Jonathan Whitmore  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to remove East Horsley and West Horsley from the Green Belt. Specifically, 173 houses planned at the following locations:

- Thatcher’s Hotel, Guildford Road (48)
- Land near Horsley railway station, Ockham Road North (over the railway from the Village Hall) (100),
- Countryside Depot and Telephone Exchange, St Martin’s Close (15)
- Land at Fangate Manor, St Martin’s Close (10).

I object to the draft Local Plan for the following key reasons:
1. I object to a plan which proposes that over 70% of new housing be built within the Green belt across the Borough. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.

2. I object to the disproportionate local allocation of housing in East Horsley.

3. I object to the threat the Local Plan poses to the historic rural village of East Horsley and the blight on properties there. The plan calls for an additional village of 173 residences in the immediate area, (with narrow lanes, little or no streetlights and many listed houses).

4. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   1. The assertion that the development will result in a meaningful shift to cycling and walking.
   2. The increased volume of car traffic on the roads.
   3. The congestion this traffic will cause on the narrow rural roads in East Horsley and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the limitations of pedestrian footpaths (and the space to provide them).
   5. The lack of suitable public transport. The Horsley rail station will struggle to cope with the proposed increase in passenger traffic and car parking is already at capacity.

5. I object to the fact that insufficient consideration has been given to the environmental and ecological value of these sites.
   1. Pollution: The large increase in volume of traffic will cause an increase in nitrogen dioxide and particulates in the environment.
   2. Flooding: The site behind Ockham Road North in East Horsley is partially a level 3 flood risk area, and local residents are well aware of how much standing water there is in their gardens after rain. Building on such land will only exacerbate the problem.
   3. Schools: Local schools are already at capacity – where will newcomers go to school? No extra places are planned in the Horsleys, and any school places proposed as part of Wisley Airfield will not appear until many years into the project.
   4. Medical facilities: Similar situation to the schools.

6. I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the individual East & West Horsley Parish Plans. The top two responses as to why local residents enjoy life in East Horsley are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

I trust that these objections will be fully considered and that the proposed plans for an additional 173 residences in East Horsley is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings.

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5. I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.
   7. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

7. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

8. I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

9. I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.
After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/2651  **Respondent:** 11040993 / Justine & Jo Thorne  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

With reference to the proposed changes to the Horsley area;

I am very concerned about the extent of the housing proposal in the Horsley area and the removal of the Horsleys from Green Belt land.

Primarily, I am concerned about the network of roads and public facilities, which would come under extreme pressure, should more houses be permitted. The roads are not suitable for heavy vehicles and increased traffic. Most local roads suffer with drainage and pothole issues, without additional vehicles using them.

The local facilities, including the doctor’s surgery, would not cope with more than 500 additional families. (Over 2,500 families if I include the 2,000 houses proposed for the Wisley Airfield) There is already limited availability for appointments, without any proposal for extending the surgery and its car park, to cover the additional people, who would wish to use it.

Parks and carparks are also stretched. The Station Parade is always busy, as is the train station car park. Without additional space for the additional shoppers / commuters, there would be restricted access for current residents to use the facilities.

Finally, I understand that building on Green Belt areas is only to be undertaken in exceptional circumstances, which the plans do not demonstrate. The plans will fundamentally alter the complete dynamic of what is an exceptionally friendly and supportive community and I hope you take these factors into consideration when deciding on the fate of our village.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp172/4376  **Respondent:** 11041025 / Debra Somner Fraser  **Agent:**
C. Specific Policy Objections:

C.i. Policy 25 Gosden Hill – My Objections

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
C.ii. Policy A43 Garlick’s Arch – My Objections

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches.
2. It ignores all the thousands of previous objections made by local people.
3. There is no proven demand for travelling show people plots in this location.
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.
12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.
13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.
14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.
15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.
16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
C.iii. Policy A58 Burnt Common – My Objections

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site.
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.
15. I object to the potential impact of para 4.4.23a on Burnt Common with its over allocation of industrial zoning is subterfuge for a waste management facility which is a dishonest and underhand approach to planning and proper consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** pslp171/2794  **Respondent:** 11041025 / Debra Somner Fraser  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp17q/521  **Respondent:** 11041025 / Debra Somner Fraser  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to cooperate with the wishes of its own electorate.

Despite the thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/3329  **Respondent:** 11041121 / Catherine Dean  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Introduction
I object to each of the proposals to remove sites in this list from the Green Belt on the following grounds:

1. The identification and allocation of sites in this Plan is made without regard to Green Belt, infrastructure or other constraints. The Plan says that “allocating these sites does not grant Planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council has received about individual sites ever since the Issues and Options consultation in 2013. The Plan has hardly changed since the Council received 20,000 objections to its first draft Plan in 2014. The Inspector considering the Plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the BREXIT referendum decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. The Council was entitled to consider constraints before determining the housing number. I believe that as well as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as well as infrastructure (most notably roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

Having properly applied constraints if there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the Plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to Policy A25 Gosden Hill Farm.

1. The Green Belt at this point serves the important function of separating the parish of West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce, defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and the houses along The Street in West Clandon (owned by the same developer as Gosden Hill Farm) will come under enormous pressure. Since the 2014 Draft Plan was withdrawn, the area under consideration has been enlarged in the direction of West Clandon.

1. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a slip road provision at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

1. The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

1. The development will overburden the local road network and increase congestion on the A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A-road. In places it is under 5m wide and too narrow for two lorries to pass causing them to mount the pavement (see also below).

1. I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon—a road which is already under traffic stress (see also below) and which Surrey County Council say cannot be improved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3841  Respondent: 11041121 / Catherine Dean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A26, Blackwells Farm, Hogs Back:

I object to the proposals in Policy A26, Blackwells Farm, Hogs Back, Guildford. The area is of high landscape and environmental value and lies entirely within the Metropolitan Green Belt. This site lies on the edge of the Surrey Hills Area of Outstanding Natural Beauty (AONB), indeed the parcel of land includes part of the AONB as well as part of an Area of Great Landscape Value and an area of Ancient Woodland.

The roads in this locality cannot support the traffic from an additional 1800 homes, plus the commercial, retail and community uses proposed in the policy. The addition of so much traffic associated with this development will in no way “provide relief to the A31/A3 junction, in advance of delivery of the Highways England A3 scheme”. It is not known what
the Highways England scheme might be, whether there is indeed a scheme at all, and when any such scheme might be
delivered. Meanwhile, the existing roads will be overwhelmed by yet more traffic.

The area is on part of the Hogs Back Ridge, topographically higher than the Cathedral. The road junctions at the very least
would require night time street lighting as the traffic densities are already high, and this would destroy the rural aspect of
the locality. The whole site forms the panoramic vista from the top of the Hogs Back – a historical and geological feature
which contributes to Guildford’s special character. This, too, is recognised in the Landscape Character Assessment, which
describes the Hogs Back as the ‘iconic spine to the borough’

I wish to add this further objection to my response of Thursday 14th July 2016 to the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/3332</th>
<th>Respondent: 11041121 / Catherine Dean Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A43 and A43a on Garlick’s Arch.

This site had been previously considered and rejected before the previous draft of the Plan. The site was then inserted in
the Draft Plan only hours before its publication without any consultation. I have seen no evidence that exceptional
circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The
Green Belt and Countryside study did not even consider this site. This is a cavalier approach to public engagement by the
Council.

1. The site is not a sustainable site, being far from any infrastructure facilities and transport links. The bus service is
infrequent and future residents will rely almost entirely on cars for journeys. Similarly any employees at the
employment areas will almost undoubtedly arrive and leave by car.

1. The site is susceptible to flooding and development will cause harm to the ancient woodland on and near the site.
See my comment on Policy P4 above.

1. The Green Belt at this point serves the important function of separating West Clandon from Send. Building here
will cause the two to coalesce defeating one of the objectives of the Green Belt.

1. The Council appears to view the development as an enabling site to obtain land and developer funding for slip
roads on/off the A3. This is not an exceptional circumstance to justify taking Green Belt land. The slip road land
if needed could be safeguarded in the Plan and acquired by compulsory purchase when required. Lack of current
funding for the slip road is not a justification for allowing the development of this site. If the slip road is
genuinely needed then government funding will be available for it. (One of the reasons for turning down the so
called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was
that the redevelopment of the school was not essential. As and when it became essential, Government funding
would become available. Accordingly enabling development was not necessary. The same principle applies here.)

1. The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A-road. In places it is too narrow for two lorries to pass causing them to mount the pavement, often at speed. (During the last week of the consultation period of this Plan, a resident of West Clandon had his car written off by a negligent car driver coming the other way and occupying 2/3 of the road at an obvious pinch point which is typically littered with broken wing mirrors.) It has narrow bends with poor sight lines, a primary school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for cyclists and pedestrians.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford. There is vague talk in the plan of link roads between Gosden Hill and Garlick’s Arch, all meeting at an enlarged A3 intersection at Burnt Common. The existing intersection is unlit and is accident prone. Adding two or three slip or feeder roads at this point will add to the confusion and public danger

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7335  Respondent: 11041121 / Catherine Dean  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets. Taken together with the current Council policy of “sweating assets” I fear this policy leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7336  Respondent: 11041121 / Catherine Dean  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to this policy on the following grounds:

1. The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt, and the per person infrastructure investment can be reduced, e.g. fewer pavements, sewers, utility ducting per household than in the open countryside. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development. Living in a town with good access to public transport reduces the desire for personal transportation.

2. The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately and is not sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to this policy for the following reasons.

1. I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

1. The site is in any event subject to frequent flooding and contains ancient woodland and is unsuitable for development.

1. I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/7330  **Respondent:** 11041121 / Catherine Dean  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/7332  **Respondent:** 11041121 / Catherine Dean  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the loss of rural employment implicit in this draft plan. Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/7333  **Respondent:** 11041121 / Catherine Dean  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to this policy. The policy should acknowledge that much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly, the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example, the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attraction. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7334  Respondent: 11041121 / Catherine Dean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to this policy on the grounds of its weak and ineffective wording.

- The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be explicit in the statement of policy.
- There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development in, for example the Walnut Tree Close /Woodbridge Meadows area, where very significant numbers of new homes could be provided, and in several of the existing surface car parks which are not included in the Plan. Such town centre sites could meet much of the housing need over the Plan period without harming the countryside.
- There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.
- The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.
- The policy also fails to provide guidance on design requirements, as required by the NPPF.
- The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores, and ignores the trend towards increased on-line shopping from said chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers, making shopping in Guildford a unique rather than repetitive experience. Above all, the retail development proposals must not damage the viability and historic attractiveness of the High Street.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/7320  **Respondent:** 11041121 / Catherine Dean  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I object** to Policy H1 for the following reasons:

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinized or evaluated. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the Plan period. It fails to set rules on important issues such as constraints and density and is not specific enough to provide a practical framework for planning decisions.

A much higher proportion of Surrey University students should be housed in university accommodation. The University has proved to be recalcitrant in providing accommodation in spite of outstanding Planning permissions. The policy does not do enough to rectify this.

**I object** to the increased numbers of Traveller pitches proposed. See my comment #9 in Policy S2 above.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/7322  **Respondent:** 11041121 / Catherine Dean  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I object** to this policy on the grounds that it should be more firm and explicit on “unviability” in paragraph 4.2.40. The possibility of avoiding or reducing the affordable housing obligation through use of unviability arguments is likely to inflate land values and lead to appeals. In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

Guildford’s popularity and location in the Green Belt, with the Surrey Hills, close to others towns and within the London Commuter belt mean that demand is virtually unlimited and no amount of affordable housing will meet it. As I understand it, “affordable” homes are defined as those with a value of 80% of the market value. In a high house-price area such as Guildford, that still may not be truly affordable to many. The real need is for social or “council” housing but that will not be provided by current developer-led models.
Paragraph 4.2.3 (in Policy H1) states that the SHMA has calculated that 70% of the affordable homes needed are 1 and 2 bedroom dwellings. In Guildford town centre there are at least 6 sites, covering around 2 hectares (5 acres), that are derelict or used as surface car parks, some for decades, yet the Council appears to have had no success in redeveloping these at all. They have the potential to be used as mixed use town centre projects which could include apartment accommodation of this size. Not all of them are even included in the current Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7323  Respondent: 11041121 / Catherine Dean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Object to this policy for a number of reasons:

1. The wording of the policy is far too wide and ignores all other aspects of planning policy. As drafted the Planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

1. The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. If the proposed housing would meet identified need and adjoins a settlement under this policy wording, permission would have to be granted even in the most sensitive AONB location, regardless of whether more suitable locations were available. The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

1. The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer-led proposals which will be difficult to resist.

1. The policy wording should define “small”, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the Plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

1. The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular, I believe adding the concept of “safe and easy walking distance” extends the potential radius within
which sites will be argued to be “closely related”. Many people would regard a mile or so as an easy walking
distance and school children are expected to walk further than that before being eligible for free school travel.

1. The wording of the policy itself does not require the local connection requirement for tenants to be secured in
perpetuity - only the affordability must be secured in perpetuity. The supporting text includes this point, but it is
not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that
cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including
the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear
market housing cannot be included, and that developments should remain outside the open market in perpetuity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7337  Respondent: 11041121 / Catherine Dean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed
significant Green belt developments. The borough’s infrastructure is already heavily strained. However the Plan’s
determination to build large housing estates across the Guildford countryside significantly increases the need for
infrastructure investment without securing the means for its provision. Placing housing in the established urban areas
would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion -
averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get
worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road
network has not been given sufficient consideration. Some proposed development locations would require highway
schemes that are unlikely ever to happen.

With some 5,000 houses being proposed close to the villages of Ripley, Send and West Clandon, the roads serving the
villages will become even more congested. Cycling has become an ever popular past time, particularly at weekends when
hundreds of cyclists pass through the villages on their way to the Surrey Hills. With no proper cycle lanes on the narrow
local roads surrounding the villages and with greater vehicle traffic being generated from these developments there is a real
danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the
local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result
in the road becoming ever more dangerous for pedestrians. The council has a statutory obligation to protect the public and
the additional traffic flows will bring added accidents, noise, pollution and injury to the public. In the case of West
Clandon, the Street often only has a narrow footpath on one (alternating) side of the road making it very dangerous, especially when vehicles mount the pavements as some have to do in places in order to pass.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this Plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the Plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local Plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This Plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. Implementation is critically dependent on providers outside the Council’s control and Community Infrastructure Levy income. Instead of recognizing this as a key constraint, the Plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as many local doctors’ surgeries will have their services stretched and overwhelmed. Many of these services are already at capacity with waiting times of 2 weeks to see a GP. Any further development without funding will place further stress upon existing health services. There is no provision for increasing the capacity of the Royal Surrey County Hospital, Guildford. Where is this to be assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7338  Respondent: 11041121 / Catherine Dean  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away, even if they ever happen, and are beyond the command of the Council. The draft Plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network.

Road infrastructure represents a major constraint that should have been applied to the OAN at a much earlier stage in the Plan process and not left as an unresolved difficulty in the draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7325  Respondent: 11041121 / Catherine Dean  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this policy as I am concerned it weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan, which welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated. The policy should be tightened up.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7326  Respondent: 11041121 / Catherine Dean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this policy for the following reasons:

1. It does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local Planning policy. The Green Belt is not the Council’s to give away and once it is gone, it is gone forever. Sacrificing areas of the Green Belt to a developer-influenced growth agenda is a betrayal of future generations and does not constitute sustainable development. Green Belt was last taken in the 2003 Plan and now it is again proposed to move the boundaries.

1. The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the Plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

1. Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.
1. The Countryside Study was a simplistic exercise based on the erroneous principle that ranking Green Belt land would identify candidates for development. The Council has not carried out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently Planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

1. I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process, many of these villages do contribute to the openness of the Green Belt (a term which neither the Plan nor the NPPF defines) and there is no need to inset them. I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling, and that infilling is also proposed outside the settlement boundaries of a further 11. In effect, each village will become a nucleus for further development. The NPPF’s other four tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development.

1. To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need and has caused intense opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

1. Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” This is misleading. Since the Second World War, Guildford has been expanding to the north east, starting with the Bushy Hill estate in the 1950’s, then Merrow Park and Weybrook Park were built on around 100 hectares of Green Belt land in the 1980’s, and now 89 hectares of land from the adjacent Gosden Hill Farm is also to be taken out of the Green Belt. This will connect to the proposed Garlick’s Arch development (30 hectares), also in the Green Belt, via several slip roads and feeder roads alongside the six-lane A3 (a further 4.5 hectares). If allowed, these two proposals will more than double the area of Green Belt land hitherto removed to enlarge Guildford’s NE suburbs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7328  Respondent: 11041121 / Catherine Dean  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to development in areas which are at risk of flooding (Policy P4). National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7317  Respondent: 11041121 / Catherine Dean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this policy. The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both Plan-making and decision-taking.” The policy calls for “development that secures the economic, social and environmental conditions in the area”.

As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead there is no definition of “sustainable development” and no principles for balancing economic growth, social justice and environmental protection in practice to local Planning decisions are given. However, apparently, all excursions into the Green Belt constitute “sustainable development”. Policy S1 fails to recognize that economic growth, social justice and environmental protection often conflict. It is clear that economic growth has trumped the other considerations in breach of the NPPF’s requirements.

Policy S1 is seriously deficient in omitting any mention of the Green Belt. It should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections as required by the NPPF. This would set one clear boundary to Planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve Planning applications “wherever possible” and “without delay” seems to fly in the face of the NPPF presumption in favour of sustainable development and becomes a presumption in favour of any development at all. It also seems at odds with public statements from the Leader of the Council to the effect that including a site in the Plan does not mean that permission will be given for development.

The policy ignores the 12 Core Planning Principles set out in NPPF paragraph 17.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7319  Respondent: 11041121 / Catherine Dean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy S2 on a number of grounds:

1. Almost every element of the Plan is predicated on the OAN adopted as the housing number. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. The algorithm used to calculate this number has been declared commercially sensitive and has not been revealed. I believe this number to have been seriously overstated before the BREXIT referendum but it is utterly without foundation now.

2. The number is based on a Housing Market Area (HMA): “West Surrey” comprised of Guildford, Woking and Waverley. Rushmoor is excluded in spite of it being easily reached from Guildford town centre. “West Surrey” is much too small. Half of Guildford Borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton, Haslemere, Reigate, Redhill and Basingstoke but all lie well outside “West Surrey”. Guildford is in the London commuter belt and part of a far wider and more complex housing market.

3. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The Plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get Planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

4. The OAN/housing number of 13860 is not as fixed as it would appear. The number of homes proposed, plus existing Planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. There are references in the evidence base documents to the possible need to make up shortfalls in Woking’s provision and the “Sustainability Assessment” carried out for the Council came up with a preferred figure of 15860 houses. It is unreasonable to embark on the most extensive transformation of the borough on the basis of an unclear housing target. The scale of the development proposed increases the onus for it to be seen to be sound.

5. The Plan in general and this policy in particular do not address the point that Guildford exists as part of London's commuter belt. In this area the demand for housing is, in practical terms, unlimited. The increase in the supply of housing in Guildford will simply result in a shift of population into the area. “Affordability” is not a fixed sum but is dependent on market prices. The Plan will not reduce prices or increase affordability except at the margins. There is now recognition that in central London, where urban regeneration has transformed many districts and the term “inner city decay” is out-of-date, it is now the outer London suburbs that require regeneration. Over the period of the Local Plan, this process should be factored in to housing needs in areas such as Guildford, and could reduce the rate of outward movement from London.

6. This policy does not take proper account of the constraints to development which exist, principally posed by the Green Belt and by topographic and infrastructure limitations. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). I believe the Council is under a duty to properly consider applying these constraints and that this has not happened. This approach differs from the other boroughs in Surrey. The Plan is based on the assumption that “growth is good”. More consumption, more congestion, more Green Belt being taken - this is not a sustainable strategy.

7. The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon, Ripley and Send in particular. The developments at Garlick’s Arch and Gosden Hill Farm will put severe strain on the road infrastructure in and around West Clandon which will be unable to cope. The proposed A3 slip roads at Burnt Common will make matters much worse. There will be a significant increase in traffic flows along the A247 through West Clandon, funneling into several pinch points which are under 5 metres wide. Here, two lorries cannot pass without one mounting the pavement, along which young children are walking on their way to the village school. The edge of urban Guildford will be moved much closer to West Clandon. Guildford’s edge
will be built on Green Belt land which was zoned to safeguard the countryside from encroachment and check the sprawl of large built up areas.

8. The Plan is out of balance in proposing 65% of housing on the Green Belt and 36% in the three wards of Lovelace, Send and Clandon and Horsley. These are rural areas whose identities will be greatly and detrimentally changed by these proposals.

I object to the proposed increase in the number of Travellers’ pitches. [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]

[Summary of redacted paragraph: Objection to the proposal for additional traveller pitches, often in the Green Belt. The proposal would increase tension with the non-traveller community and have social, economic and environmental impacts]

The open-ended wording of the numbers to be permitted (at least 73 “or any new target as identified within an updated Traveller Accommodation Assessment”) is dangerous.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: SQLP16/1107</th>
<th>Respondent: 11041121 / Catherine Dean</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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**Question 1: Evidence Base. I do not agree** that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

- The evidence base documents take no account of the radically changed environment and outlook following the BREXIT referendum. This is hardly the fault of the Council but is nevertheless a serious flaw and requires a re-evaluation of the strategic context.
- The Transport Assessment was published at the same time as the Plan leaving little time for study and analysis. The projections contained appear to be quite inadequate in that 1) they average congestion over 3-hour time bands, which materially reducing the impact of congestion and 2) they do not model junctions.
- The “Assessment” shows that congestion will worsen significantly over the period of the Plan even if all the proposed and aspirational infrastructure is built.
- The Strategic Housing Market Need (SHMA) attempts to justify an Objective Assessed Need (OAN) based on a very aggressive desire for economic growth in the borough. No case is made that such growth is sustainable. The assumptions and estimates are opaque and have not been adequately scrutinized by Councillors. Consequently people have to take on trust the work of a consultant. In any case, political events have overtaken the SHMA.

The number and complexity of the documents in the evidence base make reading, understanding, analysis and assimilation extremely difficult.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
### Comment ID: SQLP16/1108  Respondent: 11041121 / Catherine Dean  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

This is surely a matter for legally qualified people. I am unable to judge whether the Proposed Submission Local Plan as a whole is legally compliant. Doubtless the Inspector and the legal representatives of parties to the hearing will decide this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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### Comment ID: SQLP16/1109  Respondent: 11041121 / Catherine Dean  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

I do not agree that the Plan is sound for the following reasons:

- "Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt." Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
- The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
- The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB’s and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
- The draft Plan does not accord with the National Planning Policy Framework (NPPF) policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB’s and road infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified, together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites - which amount to 65% of the proposed housing number.
  - Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the BREXIT referendum.
  - The housing number is at least double the achieved rate of building in the Borough over the last several years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
• Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag behind development and lead to much higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

• The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have no evidence on which to base a decision.

RESPONSES TO POLICIES:

It is my understanding that only the text in blue boxes constitutes “policy”. All the remaining text is not. If the accompanying text does not have the force of policy when planning decisions have to be made then a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little and provide little guidance for planning decisions. It is certainly not possible in many cases to read across from the non-policy wording to the policy itself.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy A25 Gosden Hill – Objections

- Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of Green Belt.
- If this development proceeds, the narrow strip of Green Belt remaining between Guildford and West Clandon at this point will very likely be proposed for development in the future by the same developer who is promoting Gosden Hill.
- The development will be highly visible from the A3 when approaching Guildford.
- Together with the developments at Garlick’s Arch and Burnt Common there will be an almost uninterrupted ribbon of development along the A3 extending 5 miles north east from the centre of Guildford. Wisley village is 6½ miles and the M25 less than 8 miles from the centre of Guildford as the crow flies. They could all join up.
- The development of this site will cause massive congestion in surrounding roads. It will generate many thousands of vehicle movements onto the A3 which is already at a crawl every day during peak periods.
- The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
- The proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3020  Respondent: 11041121 / Catherine Dean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A35 Wisley – Objection

- The Wisley development of a new village / town with at least 2000 houses, 4-entry form secondary school and employment land will generate large amounts of additional traffic onto the A3. If the slip roads at the A3/A247 junction to relieve the impact of this development on Ripley do get built, traffic on the A247 will increase dramatically and unsustainably.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3016  Respondent: 11041121 / Catherine Dean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43 Garlick’s Arch – Objections

- The amount of land to be taken out of the Green Belt seems well in excess of the space needed to build 400 homes. What will be the fate of the excess land?
- Garlick’s Arch (A43) is an unsustainable location. The nearest station is about 1.5 miles away and the bus services are infrequent. Residents will be dependent on cars.
- There is no proven demand for travelling show people plots in this location.
- Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways. The development will cause additional traffic on the A3 and the A247 and B2215 in Ripley, Send and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3018  Respondent: 11041121 / Catherine Dean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A58 Burnt Common – Objections

- This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
- The Plan calls for a minimum of 7000 sq. m. (0.7 ha, previously in the 2016 Plan a maximum figure) but the proposal is to take 9.26 hectares out of the Green Belt. There is no proper justification given for taking the additional land.
- The evidence base does not support this scale of additional industrial space and the justification for placing it in the Green Belt is not made out. If the quality of some existing industrial provision is not adequate this should cause re-development of it not a large encroachment into the Green Belt.

The 2017 Employment Land Need Assessment shows a demand of 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Burnt Common in the Green Belt.

- The reference to waste management facilities mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and should not be so casually included for this site.
- The proposal for light industry, storage, distribution and waste management activities at Burnt Common will generate large amounts of traffic including heavy vehicles on the A247.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Policy ID1 Infrastructure – Objections

- Our residents are being asked to accept very large amounts of development with little or no detail being provided on measures which would relieve existing congestion and limit future
- Much is made of the need for new infrastructure to support developments and for this to be in place as needed (listed in Appx. C to the Plan). Even if this happens the Plan admits “we forecast that there will also be an absolute increase in overall traffic volumes”. This will be most acutely felt at junctions but these effects have apparently not been analysed so that we don’t know the location or impact.
- We can be sure however that the cumulative effects of the developments in the north east of Guildford will have a devastating impact on the A247 through our village (and of course on Send). It is hard to see how any of the infrastructure proposals in the Plan (Appx. C) will do anything to mitigate this impact. GBC has little or no control over the plans of Surrey County Council as the local highways authority and it is freely admitted by SCC that they have little money available.
- The Plan now calls for nearly all infrastructure to be funded by developers (see C). We question how realistic it is to expect developers not only to pay for all the infrastructure but also to have it in place in a timely fashion. The Plan says that planning permission will be refused if timely provision of infrastructure cannot be secured. Such refusals will almost certainly be challenged in the courts. Developers’ business models are based on building and selling houses to create the cash required to provide infrastructure. People will be living on the sites well before infrastructure is complete, even assuming there are funds to provide it.
- If development were to be refused the land would still have been removed from the Green Belt and its future rendered uncertain.
- All of these developments will draw very large amounts of additional traffic to the A247 through the village. It would be naïve to think that the employment sites and schools will serve only the developments themselves. Apart from the normal movements of residents to and from the new sites there will be considerable additional traffic on the A247 generated by:
  - children from elsewhere being delivered to Gosden Hill schools and collected
  - the employees of the offices and industrial sites getting to work and returning home
  - the vehicle movements generated by distribution and storage activities
  - traffic from Wisley wishing to travel south and returning
  - traffic from Gosden Hill wishing to travel south and returning
  - traffic from Slyfield wishing to travel south and returning
- private and commercial traffic originating in the south and accessing Gosden Hill, Burnt Common or the A3 and returning (including traffic from Dunsfold)
- SCC’s business plan for Newlands Corner

We point out that although the A247 is classified as an A road, it has none of the characteristics because it:
- is less than 2 vehicles wide in places. Larger vehicles routinely mount the only pavement.
- does not have continuous footpaths
- has several sharp bends
- has a hump-backed bridge over the railway, with poor site lines
- has a dangerous junction to access the station
- has a dangerous and unlit junction with the southbound A3 on-slip road
- has a primary school accessed by narrow pavements
- is largely unlit
- is already very congested at times, more so when delays on the A3 are severe

EXAMPLE OF FREQUENT CONGESTION ON A247

These pictures were all taken on the same morning (attached)

In summary, the A247 is quite unsuited to coping with additional traffic and it is very clear that the developments proposed in the 2017 Local Plan will increase the amount of traffic on this road over and above that in the 2016 draft to which residents strongly objected. There is nothing in the Infrastructure Schedule which addresses this issue. Indeed several of the infrastructure proposals will themselves lead to significant increases in traffic on the A247.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 📄 lp.jpg (299 KB)
Policy P2 Green Belt - Objection

The Plan states: “4.3.16 National planning policy requires that Green Belt boundaries are only amended in exceptional circumstances and that this must be undertaken as part of the Local Plan process. We consider that exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development.”

- In the introduction to the Policy statement, numerous sites are taken out of the Green Belt including Gosden Hill, Blackwell Farm, Garlick’s Arch, Burnt Common, HM Prison Ripley Road, Send, and a number of villages. The Plan fails to detail the exceptional circumstances that have been identified for each site that is to be taken from the Green Belt.
- It appears therefore that the Plan is based on an assumption that because the housing number cannot be accommodated on brownfield or previously developed land in the Green Belt, it is legitimate to move the boundaries. A blanket change to Green Belt boundaries is being made to facilitate development. That is not in accord with the NPPF or ministerial statements.

Policy P2 Introduction – Objection

- The removal of Green Belt protection from the site of HM Prison, Ripley Road means that it could come forward for housing development. The nearest feasible access to the A3 is at the A247 junction.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/259  Respondent: 11041121 / Catherine Dean  Agent:


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

Soundness of the Plan – Objection

In my view the Local Plan is not sound. The NPPF states (para 155) : “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

- The changes in this latest version of the Guildford Local Plan show little or no willingness on the part of Guildford Borough Council (GBC) to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and will bring increasing traffic congestion, pressure on other infrastructure, noise and pollution and a reduction in the quality of life of our residents.
- The Plan does not consider the implications of Surrey County Council’s (SCC) business plan for Newlands Corner to attract 100,000 more visitors a year. A significant proportion of these can be expected to use the A247.
- The Plan does not consider the Waverley Borough Council’s approval for the development of 1,800 homes at Dunsfold. This has the potential to feed traffic, which is trying to avoid congestion around Guildford, onto the A247 to access the A3.
<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPA16/2233</th>
<th>Respondent: 11041153 / Melissa Ransome</th>
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<tr>
<td>Document:</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the proposed development to site A25 Gosden Hill. Immense overdevelopment on Green Belt land.</td>
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<td>I object to the proposed development to site A42 Cockbarn Nursery, Tannery Lane.</td>
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<td>I object to the proposed development to site A35 Wisley Airfield. More unsustainable development on the Green Belt.</td>
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<td>I object to the proposed development to site A44 Land West of Winds.</td>
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<td>I object to the proposed development to site A45 The Talbot.</td>
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<td>I object to the proposed development to site A57 The Paddocks of 4 Traveller pitches.</td>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the late addition of the A43 Garlicks Arch site to the plan. Garlick’s Arch has previously been protected from development as Green Belt. The Plan proposes that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2). There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires</td>
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local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. local residents were only aware of this inclusion following a Council meeting on 11th May 2016.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8321  
Respondent: 11041153 / Melissa Ransome  
Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

There is an abundance of wildlife in this area, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. There are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4361  
Respondent: 11041153 / Melissa Ransome  
Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the A43a on and off ramp at Burnt Common and Clandon. Traffic in this area is already a problem which this will exacerbate not alleviate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9443  
Respondent: 11041153 / Melissa Ransome  
Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

No infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope. They are already at capacity, school places hard to come by. (Policy I1)

I object to the huge increase in congestion that will result from the proposed development to the area (Policy I1). The villages are already overwhelmed with traffic on roads that are in poor condition, lacking footpaths, and are too narrow. More homes will increase traffic to the area - it will just not cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9441  Respondent: 11041153 / Melissa Ransome  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed development to this site A43 Garlicks Arch. The National Planning Policy promotes sustainable developments, with sustainable transport. Bus services are reduced in the area and there is no train station within reasonable walking distance. It is non-viable for any development on this site to offer a sustainable transport solution. Development on this site is completely inappropriate (Policy I3).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9445  Respondent: 11041153 / Melissa Ransome  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to poor air quality concerns (Policy I3). The following statement is contained within the Plan: "Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health." The immense level of development being proposed, in particular to the north east of the borough, will lead to a considerable increase in congestion. This will be particularly severe in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on the health of local residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPP16/9440</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of any villages from the green belt (Policy P2). As requested by the National Planning Policy, there are no exceptional circumstances for Ripley, Send and Clandon, alongside the sites of Garlicks Arch (A43) and Wisley Airfield (A35) to be removed from the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPP16/9444</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development to areas that are at risk of flooding (Policy P4). The plan does not take into consideration any flood risks as required by the National Planning Policy). Garlicks Arch (A43) is given by the Environment Agency as an area of having a higher risk of flooding than the Council's own evaluation of the area. This area has flooded numerous times in past years and so the Council's evaluation of this area is not adequate for it to be included in the plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the local plan (Policy S1). The proposed development of 13,860 new homes is not viable. There is no need for these houses in the local community. There are inadequate public services to cope with this additional housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/615  Respondent: 11041281 / Chris Harlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

17. I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/616  Respondent: 11041281 / Chris Harlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
18. OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

° The “objectively assessed need” figure of 693 homes a year is too high.

° A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

° The current SHMA inflates the proposed housing figure due to

° failure to correct for errors in the historical data for international migration flows,

° issues with the way it considers students and affordability and

° flaws in the method for estimating the number of homes needed to support job growth.

° It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/928  Respondent: 11041281 / Chris Harlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

14. I OBJECT to Gosden Hill developement being in the Local Plan The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.
The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

15. I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

16. I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1903  Respondent: 11041281 / Chris Harlow  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8. I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1900  Respondent: 11041281 / Chris Harlow  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
5. I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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6. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7. OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/1912</th>
<th>Respondent:</th>
<th>11041281 / Chris Harlow</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E6</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourism. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in pri An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in
London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

3. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPP16/1908</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

13. I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decision

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID:</th>
<th>PSLPP16/1910</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy H3</td>
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</table>
I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1904  Respondent: 11041281 / Chris Harlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

9. I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and
with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

10. I OBJECT to the lack of proper infrastructure planning for sites (Policy II)

Policy II requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1905  Respondent: 11041281 / Chris Harlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

11. I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy II)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 &
M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make
the situations worse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

12. I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID:</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

3. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an **exceptional circumstance** for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and...
the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1899  Respondent: 11041281 / Chris Harlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? (  ), is Sound? (  ), is Legally Compliant? (  )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1895  Respondent: 11041281 / Chris Harlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
<table>
<thead>
<tr>
<th><strong>Objections to Guildford Borough Proposed Submission Local Plan (June 2016)</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.</td>
</tr>
<tr>
<td>I set out below my objection to specific policies and matters within the Plan.</td>
</tr>
<tr>
<td>1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)</td>
</tr>
<tr>
<td>The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.</td>
</tr>
<tr>
<td>The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.</td>
</tr>
<tr>
<td>The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.</td>
</tr>
<tr>
<td>The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.</td>
</tr>
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</table>

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

| **Comment ID:** PSLPP16/1896  **Respondent:** 11041281 / Chris Harlow  **Agent:** |
| **Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
2. I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3825  Respondent: 11041569 / Peter Belton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the local plan as a whole, as the Borough has failed to provide proper evidence of the need for such a large amount of housing and for the appropriateness of most of the development.

I believe the Local Plan 2014 lacks valid research and evidence of need; lacks planning for infrastructure improvement already needed without further development of the area; and is being rushed through using the wrong Regulation (19). It must be properly reviewed and consulted fully under the correct Regulation 18.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16099  Respondent: 11041569 / Peter Belton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removal of Send and other villages from the green belt. This can only be done in exceptional circumstances according to planning law, and none exist in this area. The interests of developers profiting from indiscriminate urban development are not exceptional circumstances.

Any weakening or exceptions to green belt protection will lead to its permanent loss. The green belt must be protected in its entirety, according to current law. It is the lungs of the densely populated south east, and an area that is enjoyed by millions, including valuable tourism from abroad.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16100  Respondent: 11041569 / Peter Belton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Developers must use the many brown-field sites identified in the Borough before any other sites are even considered. Developers (and some Councillors) put profit above every else, leaving the taxpayer to pick up the ongoing bill for inappropriate development and inadequate infrastructure improvement.

We want government at all levels to show vision and innovation in development matters, and to conduct planning with due diligence and integrity, as it is the future of their own families at stake as well.
Having reviewed the Local Plan I want to express my concerns over many aspects of the development included. I feel the Council has ignored objections residents made in the 2014 consultation, showing a complete lack of consideration for the impact such extensive development will have in the local area.

**I object** to the Council making substantial last minute changes to the plan, such as the Garlick’s Arch development in Send and the addition of a major alteration/enlargement of the junction on the A3 at Burnt Common. There are also many other significant changes to the 2014 plan. This requires a full consultation under Regulation 18, not the limited consultation under Regulation 19 for minor changes.

I think the brief six week Local Plan consultation, placed in summer when many people are away on holidays, is a deliberate act to limit residents’ opportunity to fully review the extensive documentation comprised in the Plan and to then make any appropriate objections if required.

**I object** to both these developments on the grounds that there was improper use of Regulation 18; no local consultation; that Garlick’s Arch is green belt land which includes an area of ancient woodland and parts of which are low lying and subject to flooding.

**I object to the** alteration to the A3 junction at Burnt Common, as it has not been part of a full infrastructure review and proper consultation with local residents. It was added to the plan at the last minute to avoid proper scrutiny.
I object to policy A42 - both to the original 45 homes and the 33% increase to 60 homes, as this is on green-belt land; local roads are unsuitable and congested, in particular the A247 Send Road, plus Tannery Lane is too narrow for two way traffic and increased traffic flow. I know that the proposed site in Tannery Lane is subject to flooding, as a resident and walker in the area for many years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2957  Respondent: 11041569 / Peter Belton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A58 - on the grounds that again it is part of the Green-belt so development is not permitted, and further, that such development is inappropriate when other industrial sites in the Borough have empty space (e.g. Slyfield Industrial Estate) and there is no proven need for further industrial space. I object to the wording 'minimum' replacing 'maximum' of 7000 sq m, which opens up any approved development to unlimited expansion. This is an abuse of the planning process. The residential A247 Send Road is narrow in places, in spite of linking the A3 and M25 to Woking town centre and its mainline station to London, and coach service to Heathrow Airport. It is congested in peak times, carrying heavy vehicle and commuter traffic through the bottle necks of parked cars and the narrow bridge at Broadmeads, which is not wide enough to allow two heavy vehicles to pass over it at the same time. Cyclists commuter into Woking, create further congestion at peak times. Adding to this traffic from hundreds more houses and industrial sites, and traffic from other huge proposed developments at Wisley Airport and nearby Ockham, Clandon and Horsley wards, (policies A35, A37, A38, A39 and A40 - at least 2500 homes) is utterly inappropriate and without evidence of need.

On a daily basis, the A3 from Burpham to the M25 is at a virtual stand-still in both the morning and evening peak times due to the weight of traffic. Any major hold up on the M25 or A3, the traffic can back traffic up as far as the A247 at Broadmeads. Adding more commuter and industrial traffic will only exacerbate this, while changing the junction at Burnt Common is unlikely to improve the situation, and could actually add to the problem.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1342  Respondent: 11041569 / Peter Belton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the local plan, on grounds that much of the development is on Green-belt land. The Borough does not provide sound evidence of need, and does not provide infrastructure improvement already needed and cannot be trusted to ensure sufficient investment in infrastructure to accommodate additional local development.

I object to removal or inset from the Green-belt of Send and other villages in the Borough, or sections of land such as Send Business Park (Policy 2 at paragraph 4.3.15). This can only be done in exceptional circumstances according to law, for which none exist. This is deliberate erosion of the green-belt by stealth. Any exceptions made to green belt protection will lead to its demise. All green belt land in Britain must be protected in its entirety in perpetuity as the law intended and stands.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Having reviewed the amendments to the 2016 Draft Local Plan under regulation 19, I am deeply concerned to see that the Council has ignored most of the concerns raised by Borough residents in both the 2014 and 2016 consultations.

I am concerned that there are conflicts of interest within both the Council and Central Government, and indirectly some elected representatives at both levels stand to profit from the property market as a result of this unfettered push for development.

Hidden among the amendments in this controversial regulation 19 review, is further extension of the earlier proposed developments, including increased house numbers and expanded business space allocation, and intruding further into protected green-belt land. There is also a blatant disregard for the risks of developing areas in defined flood-zones 2 and 3, with such wording removed from a number of policies. I objected to such proposals in both previous consultations.

There is the potential for demand for housing to decline when Britain leaves the EU, especially in areas like Surrey, and the Local Plan does not take this into account.

There are many brown-field sites in the Borough, and it must be mandatory to develop these before any other sites are even considered, regardless of developers shying away from them.

Our elected representatives at all levels must conduct themselves with due diligence and integrity, for the long term future of all, including their own children, not for the short term profit of a few.

This Local Plan shows no integrity nor validity, just a hidden agenda for development at any cost.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPA16/2992</th>
<th>Respondent:</th>
<th>11041601 / Robert Bayley</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Once again the “revised” Local Plan circulated by Guildford Borough Council is based upon flawed arguments, inaccurate information and in many examples a complete disregard for rational and intelligent thought.

I OBJECT to the Local Plan in its current state in its entirety and have outlined some key areas below.

UNFOUNDED HOUSING NUMBERS

I OBJECT to these statistics.

There is a total lack of transparency concerning the model used for estimating population growth and the required number of new houses to meet this.

The Local Plan is based on a population increase which is almost 70% HIGHER than the official national estimates for population growth in the Borough.

How can an unjustified number like this be used as a basis for a Local Plan? This would mean, for example, a 35% increase in households in West Horsley alone – an area already suffering from aforementioned infrastructure issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

REMOVING THE HORSLEYS FROM THE GREEN BELT

I OBJECT to this proposal.

Policy P3 states that “We will continue to protect the Metropolitan Green Belt, as shown on the proposals map, against inappropriate development. In accordance with national planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.”

What “very special circumstances” have been demonstrated that warrant taking the Horsleys out of the Green Belt? The Plan’s projected housing numbers are flawed, whilst the roads, schools and doctors’ surgeries are already overloaded.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is utterly implausible.
Furthermore, the Green Belt is not the Council’s to give away, and once it is gone it is gone forever.

EXTENDING SETTLEMENT BOUNDARIES OF THE HORSLEYS

I OBJECT to this proposal.

There are no concrete reasons why these areas should be extended – other than a sneaky plan to carve out more land for future development.

OVERLOADED INFRASTRUCTURE

I OBJECT to this inevitable result of the Local Plan.

It is obvious that not a single member of the Local Plan’s drafting team has visited the Horsleys in recent years. Roads are full of potholes from the sheer volume of traffic, drains do not work and roads flood repeatedly, schools are oversubscribed and trying to get an appointment at the doctors’ surgery is next to impossible.

How can anyone even dream of making this scenario worse by the addition of new households?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12469  Respondent: 11041601 / Robert Bayley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

DEFINITION OF STATION PARADE AS A “DISTRICT CENTRE”

I OBJECT to this classification.

I, and many others, argued this point in previous letters and am rather incensed that this is still an issue. Staion Parade is in no shape or form a “district centre” and yet again one must question whether any member of the Plan’s drafting committee has bothered to come here and take a look?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12472  Respondent: 11041601 / Robert Bayley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
MISUSE OF GUILDFORD TOWN CENTRE AND EXISTING BROWNFIELD SITES

I OBJECT to these proposals.

There is a fundamental flaw in the draft Local Plan, in that there are not enough dwellings planned in urban areas, in particular, Guildford town centre.

There is falling demand for retail space in town centres throughout the country as internet shopping continues to grow (see independent research and CEBR studies). Guildford is a prime example. What Guildford needs is a new focus on speciality high quality shopping supported by a revival of the town’s heritage core, historic visitor attractions and a diverse selection of restaurants.

As an existing urban centre, it should furthermore receive a larger share of proposed new housing by making use of its brownfield sites.

Paragraph 17 of the NPPF states that to “encourage the effective use of land by reusing land that has been previously developed (brownfield land)” is a core planning principle. Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy.

I am very upset that the “revised” Local Plan circulated by Guildford Borough Council did not take my comments into consideration. I think it is based upon flawed logic and inaccurate and I would like to lodge my objection accordingly.

I OBJECT to the changes to Policies A36 to A41 (East and West Horsley)

• The number of potential development sites has been reduced by ONLY TWO (A36 and A41, representing a total of 138 dwellings). This leaves four sites (A27-40) which still represent a total of 395 new dwellings.
• Marginal changes such as these would still leave 70% of all new development in the borough built on Green Belt sites. No “exceptional circumstances” or any other justification is advanced for this strange imbalance.
• The deletion of two Horsley sites fails to correct the issue of relative overdevelopment in East and West Horsley, which is both excessive in absolute terms and disproportionate in relation to the rest of the borough.
• The plan fails to mention most of the known sustainability issues and infrastructure constraints affecting the Horsley sites, including public transport, traffic, road safety, parking, schooling, medical facilities, sewage, flooding/surface drainage and shops. These were fully set out in responses to last year’s public consultation.
• The density of new housing on the four Horsley sites is inappropriate, being greater than anywhere in the locality at present. Collectively, the four Horsley sites breach NPPF paragraph 81’s encouragement of access to the Green Belt and its amenity and recreation value.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4263  Respondent: 11041601 / Robert Bayley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT to the changed Policy A35 Wisley

• The two new slip roads at A247 Clandon Road (Burnt Common) and associated traffic management will not in any way mitigate the impact on Ripley High Street since traffic will need to pass through Ripley to reach Wisley.
• My previous objections therefore still stand for this changed policy concerning the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers to try again. This is disgraceful!
• There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2575  Respondent: 11041601 / Robert Bayley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
I OBJECT to the changes in Policy E7 Guildford Town Centre

- I object to the continued failure of this policy to provide much needed substantial residential development in the Town Centre which is still only a modest target of 1,300 homes. Only approximately 10% of the total planned for the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2576  Respondent: 11041601 / Robert Bayley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the changes to Policy P2

- Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital.
- It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.
- I object to the changed “insetting” of 15 villages (including Ripley) from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages.
- I am deeply upset that settlement boundaries are to be hugely extended in many villages (particularly at Send) and that infilling is also proposed outside the settlement boundaries of 11 further villages. This is completely unplanned and unmeasured development outside of the OAN.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/911  Respondent: 11041633 / Beryl Sussex  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Draft Local Development Plan - Send, Send Marsh & Burntcommon

I wish to OBJECT strongly against the addition of Garlick's Arch at Burntcommon (site no A43) to this Plan. This area of unspoilt Green Belt agricultural land of some 70 acres, which includes about 12 acres of ancient woodland (some of it dating back to the 16th century) is far too precious to be sacrificed to concrete and tarmac in the form of 400 houses and nearly 2 acres of industrial buildings and warehousing.

Quite apart from losing valuable Green Belt land, I am very concerned about all additional traffic that will be generated by an estate of this size, which will consist of about 800 cars and many HGV's. It will put unbearable pressure on all the roads around the Burntcommon roundabout (A247/B2215), The proposal to create extra entry and exit slip roads from the A3, London bound, off the A247 Clandon Road will only exacerbate the problem. The roundabout and local road system are already under considerable pressure and the proposal to build so many dwellings on the A3 corridor with further slip roads planned for entry and exit from Gosden Hill Farm would seem to be high density development in what is a semi rural location.

As well as the roads being unable to cope with such huge population growth, the local schools and the Villages Medical Centre will also be put under strain.

Please ensure that the Government's Planning Inspector sees this letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5370  Respondent: 11041857 / Catherine Carr  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Comments on the Proposed Submission Local Plan

I have read the proposed submission local plan which GBC have now published for local consultation. I would like to say that I support many of the objectives within the document and fully recognise the need to build additional housing and to share this across the Borough.

However I have three specific areas that I have concerns about where I feel that the document does not address particular local issues or that it makes decisions based on misleading assumptions.

1 Infrastructure – the proposals do not address in any way the current backlog of needs within the Borough and specifically East Horsley and similar villages and seem to assume that development money will fund the major investment in infrastructure (medical centres, schools, roads, drainage etc.) that is required for the new housing planned.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Infrastructure Policies

The section in the Proposed Submission Local Plan sets out a range of infrastructure policies.

A number of these give me cause for concern both generally across GBC where extensive housing development is proposed, but also specifically to East Horsley (and similar local villages). I am the chair of both the East Horsley Neighbourhood Plan Steering Group and the lead for Infrastructure. It is evident that:

• The Medical Centre is at capacity in terms of numbers of patients and difficulty in booking appointment. This is included in HSC5 but is not prioritised within the timescale of the Local Plan and I would support that this be brought within a 0 – 5 year timescale;

• The Raleigh Primary School which is the state school that most East Horsley children attend is currently oversubscribed and has waiting lists for all years. This is not mentioned within the draft Local Plan although currently the school is proposing that it could move to a different site within West Horsley which would permit expansion. I would support that this be included within the Local Plan.

In terms of roads, pavements, and flooding there are regular major problems in terms of:

• Managing the current volume of traffic, especially the HGVs that increasingly use the roads to access the M3 and M25,
• Living with the poor quality and maintenance of current drains that regularly become blocked and flood; and
• Using pavements that are narrow and uneven or damaged so that people in wheelchairs, or pushing pushchairs are unable to safely use them to access facilities.

Appendix C includes one other proposal for East Horsley. LPN25 a traffic management and environmental improvement scheme with no details and the assumption that this will be funded at least partly from developer contribution. This uncertainty about funding means that there will remain uncertainty and difficulty with any forward planning for issues that need to be addressed within a shorter time frame.

An added issue is that the Local Plan does not take account of the impact on a currently overstretched infrastructure of the housing developments within both East and West Horsley and potentially Wisley, as many commuters will use the two railways stations within the village with a consequent impact on roads usage and demand on other facilities.

I would call your attention to a report by McKinsey Global Institute (The Times 27th June 2016) which concluded that Britain has a 0.4% gap between its estimated requirement for infrastructure needs before 2030 and its current spending.
GBC’s Local Plan has a fifteen year timeframe and it seems imperative that it fully addresses the need for investment in infrastructure both to meet the current shortfall and to support further development.

_I accordingly object to the infrastructure proposals on the grounds that they do not address the current need to meet deficiencies in infrastructure. I also object to the proposals in that they do not meet the stated objective of providing infrastructure to support the proposed developments._

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5371  Respondent: 11041857 / Catherine Carr  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2  Loss of protection for the Green Belt. The draft Local Plan states that “We will continue to protect the Metropolitan Green Belt” and then is directly in breach of this policy as it proposes that 65% of housing will be built on land that is currently Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5374  Respondent: 11041857 / Catherine Carr  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Protecting Policies

Local Plan Policy P2 states that “We will continue to protect the Metropolitan Green Belt.”

However in direct contradiction to this the analysis in the Appendix shows that 65% of the developments proposed in the Local Plan are to be built on land currently within the Metropolitan Green Belt.

It has been repeatedly stated within government by different ministers that unfulfilled housing needs does not qualify as a special circumstance and our local MP Sir Paul Beresford has reiterated this in a letter of 21st June 2106 – “that Government Advice is unmistakeably clear – that housing need alone is not adequate grounds for building on the Green Belt.”
This was stated by GBC’s Planning Officer in assessing an earlier application for the Wisley site – “it has not been demonstrated that the benefits clearly outweigh the harm to the Green Belt”.

I therefore object to Policy P2 on the grounds that it breaches central government policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5372  Respondent: 11041857 / Catherine Carr  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3  The scale of the house building programme which is based on unclear methodology that provides an estimate of housing need of 25% in contrast to that provided by the ONS of 15%

I therefore object to the Local Submission Local Plan.

More detailed arguments are set out below

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5375  Respondent: 11041857 / Catherine Carr  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Strategic policies - Policy S2 Borough Wide Strategy.

This policy has the objective of adding over 13,000 new homes over the 15 year period, which equates to an annual build of 693 homes per year. This is a net increase of 25% in the housing stock, whilst the ONS is projecting a population increase of 15%. There is no adequate explanation for this discrepancy.

The West Surrey Strategic Housing Market Assessment, (SHMA) is faulty in that it estimates 517 houses as the demographic starting point which is what the ONS predicts but then adds in additional homes to “support economic growth”, which is already factored into the ONS statistics. A further 31 homes per annum are included to “improve
affordability” where the GBC Affordable Housing Policy H2 already includes that most development sites would include 40% of their homes as affordable.

My reading of the document is that GBC are trying to convey that the housing numbers are needed to fulfil the NPPF requirements based on central government policies whereas the numbers are based on local and political aims.

I therefore object to the housing targets set out in Policy S2

APPENDIX

The following table sets out an analysis of new housing developments proposed in the draft Local Plan and provides an estimate of the new of developments which are set within the Metropolitan Green Belt:

Planned Delivery between 2018 and 2033 (See Policy S2, page 27)

<table>
<thead>
<tr>
<th>Settlement</th>
<th>Homes (net increase)</th>
<th>Currently Greenbelt</th>
</tr>
</thead>
<tbody>
<tr>
<td>Guildford Town Centre</td>
<td>1,172</td>
<td></td>
</tr>
<tr>
<td>Guildford urban area (excluding Town Centre, including SARP)</td>
<td>1,570</td>
<td></td>
</tr>
<tr>
<td>Ash and Tongham</td>
<td>91</td>
<td></td>
</tr>
<tr>
<td>Inset villages and infill development within identified Green Belt villages</td>
<td>431</td>
<td>Y</td>
</tr>
<tr>
<td>Rural exception housing</td>
<td>90</td>
<td>Y</td>
</tr>
<tr>
<td>Previously developed land in the Green Belt</td>
<td>299</td>
<td>Y</td>
</tr>
<tr>
<td>Ash and Tongham strategic location of growth</td>
<td>1,241</td>
<td></td>
</tr>
<tr>
<td>Urban extensions to Guildford including Gosden Hill Farm, and Blackwell Farm (Policies A25 and A26)</td>
<td>3,940</td>
<td>Y</td>
</tr>
<tr>
<td>Former Wisley airfield (Policy A35)</td>
<td>2,100</td>
<td>Y</td>
</tr>
</tbody>
</table>
Normandy and Flexford village expansion (Policy A46)  1,100  Y

Village extensions (including Ash Green southern site)  993

Ash Green southern site (Site A27)  58

Village extensions (excluding Ash Green southern site)  935  Y

Windfall  625

Totals: 13,652  8,895

Proportions: 100%  65%

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3799  Respondent: 11041953 / Elizabeth Baxter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to express my opinions on the above document and its proposals.

I object to the imposition of an unsupportable burden on the drainage infrastructure, the schools, the roads’ network, the medical services, and the parking in the shopping areas. None of these seem to be addressed in the plan.

I object to the high density and large volume of housing planned, as they are unbalanced and will change the nature of the village quite out of character.

I object to the extra volume of traffic that will inevitably follow such a large expansion.

Since the National Planning Policy Framework requires that new residential development must respect the character and density of housing in the area and take into account the infrastructure and local facilities I cannot see how the Plan caters for this.
The Green Belt was set up in law to provide for the maintenance and care of an area of countryside between villages to maintain not only the countryside but also the individualism of the villages. If this is changed then the spread of conurbations will clearly mean the Surrey area ends up being a further extension of the London suburbs.

The well being of the countryside is paramount to the health, economy and lifestyle of many thousands of people now and in the future in Surrey. The loss of habitat will be irreversible and has huge consequences for the ecology of the remaining countryside.

I would be particularly upset to see the development of land in the Northern section (A40) of West Horsley that is alongside our house and is where we keep our sheep.

This provides much character and green space for the wildlife in the area.

The land is commonly under water when there is substantial rain as shown below and housing development would exacerbate those problems.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPS16/7163</th>
<th>Respondent: 11041953 / Elizabeth Baxter</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A40</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</tr>
</tbody>
</table>

A stables use the land in the northern half of this plot and clearly further erosion of land available for this sort of recreation puts further pressure on the provision of suitable land for the local population to indulge in healthy outdoor pursuits.

Access to these fields is quite restricted being already surrounded by existing housing. Access required for large vehicles for development would create considerable disruption. The loss of view and amenity provided to all these houses by being adjacent to the countryside would be of huge detriment to these residents who enjoy this outlook, myself included.

I am sure that within the Guildford Borough many more “brown field” and urban sites can be identified rather than creating huge development in the villages of Surrey.

Clearly there are other areas in West Horsley that are considered for development too. All of these areas carry some of the same ill-considered reasoning for development. Overall any large increase in development within the village would seriously strain the facilities and infra structure at present in place.

As a broad outline I object to the large scale increases in building that the Proposed Submission Plan suggests. My wife and I strongly disagree with the removal of the Green Belt Status from the villages of Surrey and in particular that of West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/1591  Respondent: 11042369 / Huw Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT to building 45 houses at Clockbarn Nursery.

Tannery Lane is a narrow and twisty lane unsuited to large volumes of traffic, and its junction with Send Road is already hazardous for vehicles leaving the lane. Send Road is already subject to traffic problems at peak periods – an increase in traffic exiting Tannery Lane will add to these problems, especially in view of other proposals in the draft Plan (see below).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1592  Respondent: 11042369 / Huw Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT to building 400 houses and 7000 sq meters of industrial space at Garlick’s Arch.

The industrial space is not needed, but if it were this is not a suitable location for it. There is an established industrial zone at Slyfield, and any additional requirement should be located there.

If 400 houses were built on this Green Belt land the character of the local community would be totally transformed. Existing roads would not be able to cope with the additional traffic – they are already severely congested at peak times – especially if the proposed site at Gosden Hill Farm proceeds plus the proposed new A3 interchange at Burnt Common.

There are already difficulties in obtaining appointments at the local Medical Centre and the local primary and secondary schools are already over-subscribed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1593  Respondent: 11042369 / Huw Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
I OBJECT to a new interchange with the A3 at Burnt Common.

Existing traffic volumes plus proposals for Garlick’s Arch, Gosden Hill Burpham, together with numerous smaller developments in the immediate vicinity, and also the proposed development of Wisley Airfield would result in the quantity of traffic travelling along Send Road to/from Woking becoming intolerable. This would not only affect Send and Ripley, but also Old Woking and Kingfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to the development of 40 houses and 2 travellers’ pitches at Send Hill.

The only access to this site is a very narrow country lane, and is totally inadequate for the volume of traffic which would be generated by this proposal. There would be substantial impact on the residents of housing adjacent to Send Hill and the traffic problems referred to above would be added to by this proposal.

Please ensure that these objections are shown to the Planning Inspector who will be considering your draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
With reference to the Draft Local Plan published by Guildford Borough Council, I wish to **OBJECT** to the following proposals:

**I OBJECT to Send Village being removed from the Green Belt.**

The Green Belt was created to protect open spaces and prevent the indiscriminate growth of individual communities and loss of community identities. Politicians frequently promise to protect the Green Belt but this proposal is a clear breach of these hollow promises. There are no special circumstances that justify this breach of public faith in their representatives and officers.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp173/397  **Respondent:** 11042369 / Huw Williams  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp172/3056  **Respondent:** 11042369 / Huw Williams  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )
• The increase to 60 homes in place of 45 (a 33% increase) is excessive
• It ignores the hundreds of previous objections made by local residents
• It will worsen access and traffic problems in Tannery Lane and at the A247 junction
• It will make erosion of the Green Belt in our village much worse
• It will make surface water flooding, which is already bad, even worse
• It will impact on open countryside views from the River Wey Navigation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3057  Respondent: 11042369 / Huw Williams  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• It ignores the thousands of previous objections made by local residents
• There is no proven demand for Travelling Showpeople plots in this location
• It is beautiful permanent Green Belt and no “exceptional circumstances” exist
• It will cause over-development of our village and the number of homes is excessive
• It is exquisite ancient woodland that existed at the time of Elizabeth 1
• It will join up Ripley and Send and defeat the key purpose of Green Belt
• It is subject to frequent flooding and is currently a flood zone 2 allocation
• It is contaminated with lead shot accumulated over fifty years
• It will generate excessive traffic that will block up the roads of send and ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3058  Respondent: 11042369 / Huw Williams  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
• It was deleted from the 2014 draft because of all the objections made previously
• The word “\textit{minimum}” is a change from the previous “\textit{maximum}” in the 2016 Plan and since that time there has been a decline in demand for industrial land
• There is no need to build industrial or warehouse developments in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
• The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 Hectares for industrial land for the whole of the Borough, not a huge allocation of 10 Hectares at Send in the Green Belt
• The impact on small surrounding roads will create traffic gridlock
• It will join up existing villages and defeat the purpose of Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/5663</th>
<th>Respondent: 11042401 / Richard Gray</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I am writing to object strongly to Guildford Borough Council’s local plan for housing and development. As a resident of East Horsley I am disappointed by the proposals, these will damage the character of the village. There are not enough local services to cope with this.

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

7) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

8) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

9) I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

It would seem that GBC is taking no notice of the concerns of residents, and has not made any attempt to explain why it feels that re-drawing Green Belt boundaries is justified. We are therefore voicing our strong objection to the Local Plan, which does not solve the housing problem in a way that maintains the charm of our Surrey village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Dear Sir/Madam

I would like to object to the proposal to change the Settlement Boundary so that it includes Fangate Manor, thereby removing Fangate Manor from the Green Belt. I am writing because of my concern relating to Green Belt and to Fangate Manor:

1. We OBJECT to the proposal to inset East Horsley from the Green Belt. The proposal to inset East Horsley from the Green Belt will be detrimental to the rural character of the village and should be dropped. The specific changes proposed are not justified under the National Planning Policy Framework rules.

2. We strongly oppose and OBJECT to the proposal to remove Fangate Manor from the Green Belt and include it within the Settlement Boundary. There are no exceptional Planning circumstances to justify removing Fangate Manor from the Green Belt, and changing the Settlement Boundary does not in any way enhance the defensible nature of the Settlement Boundary. It merely involves moving the boundary from one hedgerow to another, but leads to the loss of Green Belt and agricultural land.

3. There is an ERROR in the Land Availability Assessment dated February 2016, and we ask that GBC corrects this. There is a plan on page 299 that appears to show access to Fangate Manor from Manor Close. Manor Close is a private road, and access will not be granted. MCRA would oppose any change to the character of this very quiet road. The road and the verges are narrow and are not suited to any growth in traffic.

Please can you take my objection seriously as I find this to be very damaging to our local area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **per annum in the borough being too high (Appendix D)**

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

While there is a need for additional affordable housing in the borough, selling full price houses in expensive areas where the average house price is £400k at a 20% discount to qualify as “affordable” is in reality not affordable to many first time buyers and key workers. A better strategy needs to be considered in this instance.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Respondent: 11042433 / Sam Thompson</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)**

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.
National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

If there was a need and local support for additional housing, there is an old disused farm on Portsmouth Road, closer to the village that is already for sale with an access road already there that could accommodate additional housing that would not be at risk of flooding, this would be a much better site in Ripley to build more housing, albeit only if school provision and doctor surgery provision was increased to accommodate the rise in housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.
Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

If there was a need and local support for additional housing, there is an old disused farm on Portsmouth Road, closer to the village that is already for sale with an access road already there that could accommodate additional housing that would not be at risk of flooding, this would be a much better site in Ripley to build more housing, albeit only if school provision and doctor surgery provision was increased to accommodate the rise in housing.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/11553  **Respondent:** 11042433 / Sam Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)**

I object to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Comment ID: PSLPP16/12714  Respondent: 11042433 / Sam Thompson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11549  Respondent: 11042433 / Sam Thompson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable, and with existing businesses looking to expand in situ.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12707  Respondent: 11042433 / Sam Thompson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable, and with existing businesses looking to expand in situ.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11550  Respondent: 11042433 / Sam Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12711  Respondent: 11042433 / Sam Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11552  Respondent: 11042433 / Sam Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12713  Respondent: 11042433 / Sam Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Answer (if comment is on questions 1-7 of the questionnaire): ()

I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time such as Polesden Lane. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Answer (if comment is on questions 1-7 of the questionnaire): ()

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<tr>
<th>I object to the lack of proper infrastructure planning for sites (Policy I1)</th>
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Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

Ripley and Send schools are now also at full capacity and would require expansion or additional schools being built. There is also no secondary schooling available in Ripley, Send and Clandon without sizable commutes by car due to lack of bus service provisions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.
Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time such as Polesden Lane. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

1. **I object to the lack of proper infrastructure planning for sites (Policy I1)**

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

Ripley and Send schools are now also at full capacity and would require expansion or additional schools being built. There is also no secondary schooling available in Ripley, Send and Clandon without sizable commutes by car due to lack of bus service provisions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

Furthermore, if Highways England had identified a need for an additional entrance / exit for the A3 near Ripley, they would compulsory purchase the land required to do so in the best location. They have not done this, nor identified Garlick’s Arch as a site to use.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
I object to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12717  Respondent: 11042433 / Sam Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11545  Respondent: 11042433 / Sam Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to not protecting the Green Belt (Policy P2)

I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt. Once taken the green belt is lost forever.
There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development. There is also an existing industrial site just past the Shell garage that could be extended rather than creating a brand new industrial site in Ripley/ Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12704  Respondent: 11042433 / Sam Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11547  Respondent: 11042433 / Sam Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

Large parts of Ripley and Send are in or next to flood zones, further building in the area would increase flood risks due to the reduction in run off areas and fields to absorb water.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12706  Respondent: 11042433 / Sam Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11542  Respondent: 11042433 / Sam Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over development, particularly for the villages between Guildford and the M25, including Ripley, Send and Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities and do not include infrastructure such as schools and doctors surgeries.

The strategic sites of Wisley Airfield (A35) and Garlick’s Arch (A43) are in unsustainable locations. They do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12701  Respondent: 11042433 / Sam Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
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The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/11544  **Respondent:** 11042433 / Sam Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

_Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )_

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**I object to the Borough Wide Strategy (Policy S2)**

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/12702  **Respondent:** 11042433 / Sam Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/1389  **Respondent:** 11042433 / Sam Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
My wife and I met while studying at Surrey University in Guildford. We moved away after university to Essex and then other parts of Surrey for several years before making the decision to move back near Guildford and Woking, settling in Ripley.

We made this decision because we love the area – why – because of its beauty and how rural everything is. Concreting over our countryside to satisfy some arbitrary housing figures would actually remove the reasons we decided to settle and start a family here!

We cannot continue building additional housing forever as it is simply NOT sustainable in the long term.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

RESPONSE TO GUILDFORD BOROUGH COUNCIL (GBC) DRAFT LOCAL PLAN 2014
I object to the proposals. The scale of development would put significant strain on local infrastructure and services and completely change the character of West Horsley. GBC’s plans to remove land from the Green Belt goes against national planning policy and prioritises ease of development over preserving the environment of the borough for future generations.

POLICY S2: BOROUGHWIDE
STRATEGY: Object
● No evidence is provided for the 13,860 new homes. The need for the proposed 533 extra homes in East and West Horsley seems to be down to the availability of landowners willing to sell their greenfield land for development rather than any consideration that West Horsley is the right place to build this number of homes.
● Brownfield sites must be developed first before any land is removed from the Green Belt.

POLICY P2: GREEN BELT AND THE COUNTRYSIDE: Object
● As our MP, Sir Paul Beresford was told by the Parliamentary Under Secretary of State (Planning) in his letter of 18 June 2014 in relation to the last draft local plan, “most development in the Green Belt is inappropriate and should be approved only in very special circumstances … unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt. … Green Belt boundaries should only be altered in exceptional circumstances.” Nothing central government has said since has done anything to alter this position. Unmet housing need is not an exceptional circumstance.
● The Green Belt is precious and must be protected for future generations.

POLICY I1: INFRASTRUCTURE AND DELIVERY: Object
● Developments at West and East Horsley and at Wisley Airfield will place considerable strain on already stretched infrastructure, including transport, education, medical services, parking and shops. Local school, childcare, medical and transport facilities are already overcrowded.
● The Draft plan does not provide enough detail on how further strains on resources will be
met. No information is provided about how increases in traffic produced by these developments will be managed to protect the health of residents and their safety on the road.

POLICY 13: SUSTAINABLE TRANSPORT FOR NEW DEVELOPMENTS: Object
● The developments in West Horsley will increase car use, which is contrary to sustainable transport policies.

In conclusion, I object to the removal of land from the Green Belt. There are no exceptional circumstances presented to justify this. Development in West Horsley will completely change the character of the village and put more strain on already stretched local infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/2321  **Respondent:** 11043041 / James Withers  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

SITES IN EAST AND WEST HORSLEY: Object
● The plan proposed that East and West Horsley take 35% of the new homes proposed in the borough. This is a disproportionate number and will have a significant impact on the area and its infrastructure.
● No details are given for the infrastructure planned to deal with this number of new homes.
● The density of new housing proposed is greater than anywhere locally.
● The plan presents no argument or exceptional circumstances for extension of settlement areas into the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/9658  **Respondent:** 11043041 / James Withers  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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POLICY I1: INFRASTRUCTURE AND DELIVERY: Object
● Proposed developments at West and East Horsley, Wisley Airfield and elsewhere in the borough will place considerable strain on already stretched infrastructure, including transport, education, medical services, parking and shops. The housing increase proposed is not sustainable. All options (including compulsory purchase) should be used to develop brownfield sites before any land is removed from the Green Belt.
● The draft plan does not adequately consider the infrastructure required to meet its proposed numbers of new houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9659  Respondent: 11043041 / James Withers  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY I3: SUSTAINABLE TRANSPORT FOR NEW DEVELOPMENTS: Object
● The developments proposed for West Horsley will increase car use, which is contrary to sustainable transport policies.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9657  Respondent: 11043041 / James Withers  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P2: GREEN BELT: Object
● No exceptional circumstances exist which warrant removal of land from the Green Belt. Unmet housing need is not an “exceptional circumstance”.
● Socalled “insetting” of villages from the green belt is simply removal of more land from the green belt. GBC has a duty to use plain English to describe their proposals rather than hiding behind unclear language.
● The Draft plan seems to priorities development on the Green Belt over brownfield sites in meeting future housing need.
The Green Belt land is a precious asset and its loss is irreversible. It is our collective responsibility to protect it for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9660  Respondent: 11043041 / James Withers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to GBC removing land from the Green Belt, including by insetting villages, as there are no exceptional circumstances to justify this. GBC’s efforts should focus on developing brownfield sites before any consideration is given to removing land from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9656  Respondent: 11043041 / James Withers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY S2: BOROUGHWIDE
STRATEGY: Object
● The Draft Plan does provide evidence of need for 13,040 new homes. No rationale is given for how this number has been arrived at.
● Guildford Borough Council does not say whether the number of homes they want built is more, less or the same as this figure. A housing target is needed for residents of the borough to take a considered view about the proposals.
● Increasing the size of West Horsley as proposed will change the character of the village and put significant strain on local infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/4359  Respondent: 11043073 / Ingrid Botha  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the large proposed development of 2,000 houses at Wisley Airfield as it will destroy large areas of Green Belt and agricultural land and produce massive congestion on the A3 and surrounding roads including Ripley and Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4357  Respondent: 11043073 / Ingrid Botha  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to building 45 houses at Clockbarn. The available road infrastructure simply cannot support it. Tannery Lane is far too narrow to take any substantial traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic.

I object to the fact that this site was not included in the Regulation 18 draft and has not been consulted upon previously. Full consultation is required.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4355  Respondent: 11043073 / Ingrid Botha  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposed industrial site at Garlick’s Arch. There is no need for such a site. The Employment Land Needs Assessment 2015 shows a reduction in required employment floor space from the previous draft plan. If the Council truly believes there is a need for such a large amount of industrial space it should be located at the current Slyfield site.

My son, Luke Botha, age 8 would also like to raise his objection I relation to the proposed development at Garlic arch. As a resident of the area and as the future of our country I think the children should be listened to. They see things simply and as they are and without political bias or financial motivation.

“I think it is a bad idea to build houses and factories at Garlic Arch, because you will chop all the trees down and the air will become more polluted for the people living here. There will also be lots more cars and trucks and they will make lots of pollution too. I think it is a stupid idea because all the trees and bushes will be destroyed and all the animals and birds that live there will die. I don’t think it will be a good place to live because it will be really noisy and dirty living next to the A3. I think the roads are too busy and it isn’t safe for the children to cross the road, like at the school. (Send First school)” – Luke Botha, age 8

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I object to the proposed interchange onto the A3 at Burnt Common. The interchange will cause the A247 to become a through-road between Woking and the M25. Send is building a new primary school on that particular stretch of the A247. Creating the new interchange, together with the additional school traffic, will cause immediate and virtually permanent gridlock on the A247, which would severely damage village life.

I object to the fact that this site was not included in the Regulation 18 draft and has not been consulted upon previously. Full consultation is required.

This interchange will result in significantly increased traffic volume on Send Barns Lane and Send Road as it is the only route from Burnt common to Woking.

I work on the Send Road and am held up in significant and lengthy delays on a very regular basis while travelling a very short distance along Send Road. Crossing this road is already a dangerous action to undertake as cars drive far too quickly down this road and traffic volumes are very high. Cars are parked on the sides of the road making it very narrow and it is virtually impossible to see pedestrians, particularly children, as they emerge from between the cars to cross the road.

Parking is already a problem with cars parking on the pavement in an attempt to avoid blocking the road and to allow two way traffic at all points. This results in people with babies in push chairs having to walk on the raid in the traffic to pass the cars. There are also blind residents in Send who rely on guide dogs who are equally impacted.

Traffic coming off the A3 already drives too fast down Send Barns Lane. The council have only just approved the building of new buildings to accommodate the pupils form St Bede’s on the Send First site. This planning permission did not allow for the additional parking needs that will arise from the increased pupil numbers. There will be many cars parked on Send Barns Lane and many children crossing this road where NO crossing facilities exist. The proposed interchange will bring
greater volumes of high speed traffic past the school. This will place the lives of the children and Parents of Send at risk. No interchange is worth the life of a child!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object in the strongest possible terms to the removal of Send from Green Belt status and to the proposals to build on the Green Belt fields at Gosden Hill, Garlick’s Arch, Send Hill and Clockbarn Nurseries, particularly Sites A25, A35, A42, A44 and A43. NPPF states that the Green Belt should only be altered in “exceptional circumstances.” There simply are no eligible exceptional circumstances expressed in the Local Plan or supporting documents. Guildford’s urban brownfield areas must be identified and utilised instead, not only to protect our countryside but also to limit the impact on road traffic yet provide much-needed access for new housing to transport links such as the rail network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the approach to consultation that the Council is taking. The Council withdrew the 2014 draft Local Plan following an outcry from residents. During its re-drafting, instead of arriving at a sensible alternative the Council has changed every major site in Send and added a massive new road junction. It beggars belief that the Council could on one hand state that they listened to residents, whilst on the other hand increase the planned housing levels in the village. Either way, the proposed changes are significant and therefore require another full consultation under Regulation 18, not the short-cut of Regulation 19 which the Council is using.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the exaggerated housing need figure in the West Surrey Strategic Housing Market Assessment on which the Draft Local Plan is based. The Council has declined to provide any objective evidence to substantiate the projected housing numbers, which in my view is far in excess of reality. In particular, I believe the calculation of foreign students has been wrongly used to inflate the housing need. Furthermore, the housing number is based on pre-Brexit projections for economic and population growth, including migration. These now need to be revised downwards.

I object to the fact that the impact on infrastructure has not been considered sufficiently. Current infrastructure is utterly inadequate to deal with proposed new housing levels. Roads, doctors and schools will be unable to cope. Yet no tangible resolution has been proposed.

I regularly cycle in and around the villages of Send, Ripley, I object to the development of the 400 houses at Galick’s Arch. It was included in the Local Plan at the last possible moment, with no prior local consultation It is not required in terms of housing need either for the village or the borough.

I also object to the development of the 400 houses at Galick’s Arch on the basis that the site is liable to severe flooding. The ancient woodland is a particularly sensitive area that must not be disrupted in any way.

I object to the fact that this site was not included in the Regulation 18 draft and has not been consulted upon previously. Full consultation is required.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/664 Respondent: 11043105 / Rosemary Tottman Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to oppose The Guildford’s proposed Local plans: strategies and sites June 2016. I have lived in West Horsley for over a decade and I am strongly against the plans to change the nature of the village and the surrounding countryside. The National Planning Policy Framework states that any new residential development should be in keeping with the current character and density of housing in the area. This plan does not meet that criteria and it also does not make allowances for how the current infrastructure and local facilities will be able to cope with all the additional people moving into the area.

My specific concerns include:

Education
Currently both the Raleigh and Howard of Effingham schools are full. Local children should be able to go to their local school and not have to travel outside of the village.

Housing Density and the results of this
The infrastructure will not be able to cope with the proposed additional number of houses. There are already issues with drainage when we have heavy rain and Thames Water has advised your council that the current wastewater network will not be able to support the proposed housing developments. Congestion and increase of traffic on roads is also a major concern and will not be helped by children having to travel to school outside of the local
area because of the aforementioned issue with over subscribed schools.

Green Belt
I refer again to the point re: changing the whole character of the village which would happen if this plan goes ahead. The National Planning Policy Framework says any change of Green Belt boundaries should demonstrate exceptional circumstances. The law does not state that unmet housing need is an exceptional circumstance. Therefore, the Green Belt boundaries should not be altered. This development would cause irreparable damage to the Horsleys and the surrounding villages and is completely unacceptable. It would be much better to use brownfield sites before destroying the beautiful countryside in the green belt that makes the villages here what they are.

I strongly oppose the Local plan and do not believe that you are complying with the NPFF. Given the overwhelming feeling of local people against this plan I hope you will not seek fit to implement it.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/2768  **Respondent:** 11043393 / Kerry Scott-Patel  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I want to object to the Draft Local Plan (refs A36, A39, 90, 353, 2177, A37, A38, A40, A41, 2292, 350, 1219, 1275, A35, ) affecting the Horsleys on the following grounds:

- Traffic and Parking - our streets are already congested. It is very difficult to park at the Parades on Ockham Road and due to the sheer volume of cars, it is often difficult to see people crossing the road with the consequential accident risk this has. Adding to this pressure and risk with more households which bring at least 2 cars per household on average is simply nonsensical given the potential accident dangers that could follow;

- Pollution - the large increase in the volume of traffic will cause an increase in pollution levels which is already a concern in our area.

- Flooding - the area already suffers from flooding and building in this area will only exacerbate the situation. The soil and drains already cannot cope.

- Schools - local schools are already at capacity. Where will the children of incoming families go to school? Even if the schools were to be expanded, or new schools built, the standard of education for which the area is known will suffer adversely which will ultimately impact the desirability of the area for families. Hence, the development will not lead to families residing the area if the schools are not up to scratch, and therefore the development will not achieve what it set out to.

- Medical facilities - similar point to schools.

- Transport - road and rail links are already busy, if not congested. Our transport infrastructure will be under enormous strain by increasing the numbers of users with the result that there will be failures, poor service, misery for those that travel and ultimately, make this area unattactive for people to move to. Hence, the development will not achieve what it set out to
do.
- Green belt land - developing on our countryside will slowly erode the beauty of Britain. There is a reason why Britain is so attractive to live in and this is in part due to the countryside we have here. To build in our countryside will only destroy this beauty and ultimately, make our country and in particular, this part of the country, unattractive.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that we have not been given any evidence for the need for more housing in this area. Ripley in particular has fulfilled it obligations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development of the Green Belt on Gosden Hill Farm A25 for the same reasons as above

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<td>I strongly object to the development of the Wisley Airfield site A35 - 2000 homes are completely unsustainable and shouldn’t be built on Green let land.</td>
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<td>I object to the on and off rap at Burnt Common/Clandon as this will only increase the traffic problems for all in the area. When there is a problem on the A3 - and there is almost daily - the road is completely clogged. How can it possible handle more traffic?</td>
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<td>I particularly object to the removal of any Villages - especially Ripley - from the Green Belt (“insetting)</td>
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I object to the 2016 Local Plan as the development proposed is not sustainable (Policy S10) as there have been no provisions for infrastructure improvements or account taken of roads which are impossible to widen. The traffic is already untenable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the fact that we will not be listened to on this matter and you will do whatever you please which is just bad Government!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to removal of Brownfield site (A34) from the Plan
Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I continue to object to the development of the Wisley Airfield site including the amendments in the planning appeal. It is ludicrous to require objections to the amendments when there is nothing about the development of this site that is appropriate. The local roads as well as the major roads are a capacity already and it only takes one accident to bring everything for miles to a standstill. The public transport in the area is not adequate nor can it be made to be adequate. RHS Wisley is increasing its visitor attraction and the resulting increase in traffic has not been taken into account. I also object to the fact that the council doesn’t appear to be taking any of the objections previously lodged into account.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to removal of Brownfield sites (A4) from the Plan
Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<td><strong>I object to the allocation of 6 Travelers sites in A34 Garlick’s Arch</strong></td>
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<td>The allocation of 6 Traveler plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlicks Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.</td>
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<td><strong>I object to the unfair imbalance of the Plan across the borough.</strong></td>
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<td>With the removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan has become even more biased against the North East of the borough. Guildford Borough is over 100 square miles. Of the 11350 homes proposed in the Plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.</td>
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The inclusion of site A58 Burt Common, removes the need for A43 Garlick’s Arch
GBC’s own reasons for including Garlick’s Arch A43 in the 2016 version were

- The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm,... (site allocation A25) [ than the Burnt Common site did ]”
- The site [A43] provides the employment floorspace needed in the plan to help meet identified needs”

Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (which are almost contiguous) are in the plan; therefore GBC are not following their own guidelines and objectives.

Since A58 Burnt Common is now in the Plan (2017) more than the “required” industrial space is available there, so there is no reason for Garlick’s Arch to be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2153  Respondent: 11043425 / Melinda McLean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal for a Waste Management Facility in Green Belt (A58)
The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

10. I object to the increase in housing proposed in Tannery Lane (site A42)
This has been increased by a third since the 2016 version of the Plan. This will have a significant impact on the already highly congested local rural road network around Send. This is in contradiction to section 2.14a of the Plan which states "Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays.” And yet there is no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/654  Respondent: 11043425 / Melinda McLean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the hiding of development by “deferment” (A24, A25, A26, A43)
This version of the Plan has concealed some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects:

i) to hide the number of housed actually being built (A24, A25, A26 – total of 1100 deferred, but still being built!), and

ii) give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/653  Respondent: 11043425 / Melinda McLean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the extended development in the Green Belt (Policy P2, Site A43)
I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1384  Respondent: 11043553 / Geraldine Banks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. APPENDIX C

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1383  Respondent: 11043553 / Geraldine Banks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1385  Respondent: 11043553 / Geraldine Banks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
1. **APPENDIX D**

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 – 2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from
encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. POLICY A43 AND A43a – Garlick’s Arch

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement - often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of
Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5502  Respondent: 11043553 / Geraldine Banks  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick's Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D3

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5498  Respondent: 11043553 / Geraldine Banks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E1

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5499   Respondent: 11043553 / Geraldine Banks   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5501   Respondent: 11043553 / Geraldine Banks   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY E5

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5515  Respondent: 11043553 / Geraldine Banks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>1. <strong>POLICY H2</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>I OBJECT</strong> to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.</td>
</tr>
<tr>
<td>In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.</td>
</tr>
<tr>
<td>It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.</td>
</tr>
<tr>
<td>In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.</td>
</tr>
<tr>
<td>And at what point will ‘affordable homes’ be able to go onto the market at full market price?</td>
</tr>
<tr>
<td>As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.</td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
</tr>
</tbody>
</table>

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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<table>
<thead>
<tr>
<th>1. <strong>POLICY H3</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>I OBJECT</strong> to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.</td>
</tr>
</tbody>
</table>
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses through all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related”. Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. POLICY I1

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/5504  **Respondent:** 11043553 / Geraldine Banks  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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1. **POLICY I2**

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I have been a resident in West Clandon for almost 30 years and in the past Guildford Borough Council has listened to the views of the local people. I am appalled that this process is seemingly being overturned with regard to the Local Plan and our opinions not taken into account. How can you ignore the views of many thousands of people who strongly object to these plans?

This is not YOUR town, it is OUR town! You, no doubt like us, moved to this area because we love the fact we have a wonderful town in the Surrey countryside. We have some of the best landscape in the south of England, protected by Green
Belt policies which were put in place decades ago to safeguard this lovely area for not just us, but our children, and our children’s children and for generations to come.

You have no right to start chipping away at these Green Belt boundaries – boundaries that you have repeatedly enforced in your decisions to prohibit planning applications in the Green Belt. You are guilty of breaching your own policies by simply re-drawing boundaries to suit housing purposes.

You are the guardians of our town and countryside, you are the elected protectors of this legacy. You should feel ashamed if you, by one swipe of a pen, start taking away our protection that was so passionately put in place for the whole of England to come and enjoy.

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5495  Respondent: 11043553 / Geraldine Banks  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have
answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. **SITES - POLICIES A1 TO A57**

I object to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. **The plan says that “allocating these sites does not grant planning permission for development.”** However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. **POLICY P4**

I object to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.
The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide
development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the
document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s
identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the
exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a
river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood
risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual
probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the
flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-
commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5492  Respondent: 11043553 / Geraldine Banks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running
through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework.
Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying
sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the
area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy
does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be
taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate
developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach
of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government
policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of
sustainable development in practice and is one of the most important factors affecting sustainable development in the area
covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the
Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least
one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank
rather than as a constraint to development.
The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsustainable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5494  Respondent: 11043553 / Geraldine Banks  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or
study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a plan that fails to propose a target number. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.
This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/922  Respondent:  11043553 / Geraldine Banks  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Questions posed by Guildford Borough Council as part of its consultation.

Questions from GBC

24.A. Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).
Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

**ANSWER**

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** SQLP16/923  **Respondent:** 11043553 / Geraldine Banks  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**24.B. Question 2: Legal Compliance**

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant? Please provide the following information being as precise as possible:

- why you consider it is or is not legally compliant and
- what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

**ANSWER**

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.
Instead this 2016 draft Plan actually **increases** the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/924  **Respondent:** 11043553 / Geraldine Banks  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**24.C. Question 3: Soundness**

Do you consider the Proposed Submission Local Plan: strategy and sites **as a whole** to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

**ANSWER**

I do not consider the Proposed Submission Local Plan: strategy and sites **as a whole** to be sound, because, but not limited to, the following reasons:

1. **“Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of ”About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.**
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.
1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
24.D. Question 4: Duty to cooperate

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

- why you consider it has or has not complied with the Duty to cooperate and
- what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.
12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.
13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.
14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.
15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

17. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

18. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

19. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

20. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

21. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

22. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

23. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

24. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

25. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/630  Respondent: 11043553 / Geraldine Banks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1068  Respondent: 11043585 / Judith Chapman-Hatchett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This is an excessive development, there is already significant traffic issues through Send, the road infrastructure in Send will be unable to cope with inevitable increased traffic. This is a wholesale destruction of the Green Belt in clear contravention of the Government’s stated commitment for Green Belt protection. This principle will also allow for the presumed further development of other Green Belt areas locally.

The development of Homes should be shared around the borough, not so focused around Ripley and Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This is an excessive development, there is already significant traffic issues through Send, the road infrastructure in Send will be unable to cope with inevitable increased traffic. This is a wholesale destruction of the Green Belt in clear contravention of the Government’s stated commitment for Green Belt protection. This principle will also allow for the presumed further development of other Green Belt areas locally.

The development of Homes should be shared around the borough, not so focused around Ripley and Send.

We have concerns about the impact such a large industrial development will have, especially HGV traffic and light pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
This is designated Green Belt and should not be developed, the woodland is one of the few areas left, that we can walk through and enjoy the Surrey Countryside locally.

Anecdotal evidence suggests this site has previously been a landfill site and not suited to the proposed development.

This is an excessive development, there is already significant traffic issues through Send, the road infrastructure in Send will be unable to cope with inevitable increased traffic. This is a wholesale destruction of the Green Belt in clear contravention of the Government’s stated commitment for Green Belt protection. This principle will also allow for the presumed further development of other Green Belt areas locally.

The development of Homes should be shared around the borough, not so focused around Ripley and Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I strongly object to the implementation of the GBC local plan.

There is NO Plan, that recognizes the existing borough’s settlement patterns, existing business or existing infrastructure. This plan does not create a good blueprint for the future by provides for an economic, social, and environmentally sustainable plan for the future of the borough.

This is a short term plan with an eye fully focussed on the government subsidies to be gained from new homes bonuses from central government and CIL and section 106, it does not plan for the borough in a way our children and our children’s children will thank us for accepting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3156  Respondent: 11043969 / Mercedes Underwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

villages and Major Previously developed Sites, sustainable Transport for new development

West Horsley is one village and always has been, its not west Horsley south and west Horsley North, where did you get this from? Settlement boundaries exist and do not need to be extended you give no good reasons for this and no exceptional circumstances have been presented. West Horsley only has one small shop, no post office, limited bus service during weekdays only

Homes For all/ Affordable Homes

We don’t have the roads/parking for this increase in traffic, the school is already full to brimming. There is no evidence that we need this many new homes, our own west Horsley survey showed we need 20 properties for local people who want to remain in village (downsizes/ young people). 434 homes in 3 greenbelt sites at much higher densities than currently exist would be totally out of character with existing mix.

green Belt, surrey Hills AONB

I am opposed to you removing the green belt in east and west Horsley. Guildford Borough Economic Strategy 2013-31 doesn’t make any case for siting large numbers of homes in west and east Horsley

WEST HORSLEY,

And generally
At the train station, the car park is already full quite often, where would the extra commuters park? Potentially 1200 extra cars in the village? No way.

The drains on Ockham Road North often get blocked, and back up, there are major problems and another 604 homes in the villages will lead to major problems. The drains have a lot of broken bricks in them I have heard and cannot take any more capacity.

All the traffic stopping at Glensk School is a proven bottleneck in the morning. The private schools already generate far too much additional traffic through the village first thing and last thing, building all these extra homes will make it gridlock in the mornings and afternoons.

The Raleigh School is full in Northcote Crescent, and doesn’t have room for any more classrooms or kids. Any more cars going down there for drop off would cause gridlock.

At The Medical Centre East Horsley, parking is already impossible and almost as hard as getting an appointment, it can’t take any more patients in my view and the small road to it cannot take any more cars.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development." However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to
consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as well as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as well as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

**2010 –2014 from Crashmap data**

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

**2015**

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays

  Surrey Fire and Rescue deployed.

**2016**

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).
The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3 100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.
Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brownfield site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.
Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).
I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

The proposed development at Gosden Hill Farm will also impact Ancient Woodland.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.
The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14595  Respondent: 11044129 / Christopher Barrass  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14597  Respondent: 11044129 / Christopher Barrass  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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Page 840 of 2855
I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14599  Respondent: 11044129 / Christopher Barrass  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14616  Respondent: 11044129 / Christopher Barrass  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/”Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.
4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14609  Respondent: 11044129 / Christopher Barrass  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14605  Respondent: 11044129 / Christopher Barrass  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University,
which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/14607 **Respondent:** 11044129 / Christopher Barrass **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income. And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/14615 **Respondent:** 11044129 / Christopher Barrass **Agent:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations were available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being “closely related”. In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/14602  **Respondent:** 11044129 / Christopher Barrass  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure
will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy II requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/14603</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have
considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14604  Respondent: 11044129 / Christopher Barrass  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14302  Respondent: 11044129 / Christopher Barrass  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development." However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received
20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as well as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as well as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14591  Respondent: 11044129 / Christopher Barrass  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.
Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages.

In particular I object the proposed changes to the settlement boundaries for East and West Clandon.

Neither the residents nor the Parish Councils have been consulted on this and we do not wish our boundaries to be altered.

I also object to proposed infilling. A visit to Hook Heath in Woking demonstrates how a village is turned into a crowded estate very quickly once infilling is allowed.

We wish to keep the rural nature of our villages and infilling, together with proposed development of Gosden Hill Farm, will simply create merged suburbs of the rapidly extending Guildford Urban Area.

Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.
In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

I remind you of Guildford Borough Council’s submission to Parliament:

“This Guildford Borough Council supports the fundamental principles of the Green Belt, as set out in PPG2: Green Belts (1995). They are:

1. to check the unrestricted sprawl of large built-up areas;
2. to prevent neighbouring towns from merging into one another;
3. to assist in safeguarding the countryside from encroachment;
4. to preserve the setting and special character of historic towns; and
5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”

The proposed development of the ‘strategic sites’ in this draft Local Plan goes completely against the Council’s own stated policy.

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s
identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/14587  **Respondent:** 11044129 / Christopher Barrass  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

1. **POLICY S1**

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds.

Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.
This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14588  Respondent: 11044129 / Christopher Barrass  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere;
Unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data.

There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper account of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears
to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

I would remind you that in 2009 Guildford Borough Council successfully challenged the Government’s South East Plan (SEP) to build 422 homes a year – 100 more than initially recommended by the South East England Regional Assembly – so the figure should be 322 homes a year.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/1665  **Respondent:** 11044129 / Christopher Barrass  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant. The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.
1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1666  Respondent: 11044129 / Christopher Barrass  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1667  Respondent: 11044129 / Christopher Barrass  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and
foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** SQLP16/1668  **Respondent:** 11044129 / Christopher Barrass  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.
I have lived in West Clandon for 30 years and in Surrey nearly all my life.

For a large part of that time Guildford Borough Council (GBC) has understood and supported the wishes of its electorate to retain the heritage and natural character of this beautiful part of the Surrey Hills.

Indeed in 2009 GBC successfully challenged the Government’s South East Plan (SEP) to build 422 homes a year – 100 more than initially recommended by the South East England Regional Assembly – led by the Leader of the Council and the Head of Planning.

However, the same Council’s draft Plan of 2014, went completely against this precedent, proposing wholesale destruction of the Green Belt with development and claiming that more than double the number of homes previously rejected as being too many should be built in the Borough.

As the people who pay for the Council’s personnel and services to look after our best interests the overwhelming majority of ratepayers were appalled and said so in the so called ‘consultation’ for that draft Plan.

Of some 22,000 responses the vast majority were objections against the draft Plan and specifically against building on the Green Belt.

So what had changed? The Leader of the Council had changed, and with it, apparently, the entire policy towards development in the Guildford Borough.

With the architect of the draft Plan, appointed by that Leader, discovered to be a fraud and forger, and with so many objections, the draft Plan was withdrawn for reconsideration.

In the face of a new political force – the Guildford Greenbelt Group – those seeking election from the Conservative Party assured residents ‘Conservatives Say the Green Belt to Stay’, as printed on countless pamphlets.

It was with this reassurance that today’s Conservative Councillors were elected, THEY WERE NOT ELECTED WITH A MANDATE TO BUILD MASSIVE DEVELOPMENTS OVER FIELDS AND GREEN BELT.

Now the new draft Local Plan has been published but, far from reducing green field development, it INCREASES the numbers of houses planned for green field development!

So, Guildford Borough Council has ignored the consultation process for this latest draft Plan, and the Councillors who voted for it to go to consultation have demonstrated that they gained election on a falsehood.
Guildford Borough Council DOES NOT HAVE A MANDATE FOR THE POLICIES AND SITES IN THIS 2016 DRAFT PLAN AS THEY WERE REJECTED IN THE CONSULTATION FOR THE 2014 DRAFT PLAN, AND ITS COUNCILLORS WERE ELECTED ON THEIR FALSE PROMISES.

I quote from Guildford Borough Council’s own memorandum to Parliament (see: http://www.publications.parliament.uk/pa/cm200910/cmselect/cmseast/memo/housing/ucm3102.htm)

“5.1 Guildford Borough Council supports the fundamental principles of the Green Belt, as set out in PPG2: Green Belts (1995). They are:

? to check the unrestricted sprawl of large built-up areas;

? to prevent neighbouring towns from merging into one another;

? to assist in safeguarding the countryside from encroachment;

? to preserve the setting and special character of historic towns; and

? to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

5.2 The Council does not believe that the protection of this designation for the purposes above can be linked to an increase in HMOs. As discussed, the cause of the increase in HMOs relates to many social and economic trends and policies which need to be addressed to attempt to reduce the number of HMOs. Equally, the occupants of HMOs tend to be young, single, transient people who wish to locate in town centres, close to jobs, services and public transport. A rural location would not be preferable for such a use.”

The Council should be supporting this policy.

The current draft of the Guildford Local Plan is without support from the residents it is meant to be for (not those the Council seems to believe it is for – developers), it is unsustainable, deeply flawed, particularly in its evidence base and non transparent SHMA, and is not sound.

My objections are laid out below. Many of these are shared with others, nevertheless they represent my views and I would like my objections registered as responses to each policy and site indicated to go before the Inspector.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<tr>
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<th>pslp172/4524</th>
<th>Respondent:</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp172/4525  Respondent: 11044129 / Christopher Barrass  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4526  Respondent: 11044129 / Christopher Barrass  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to
build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/4529</th>
<th>Respondent:</th>
<th>11044129 / Christopher Barrass</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
<td></td>
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11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp173/15  Respondent: 11044161 / Kerry Denholm-Price  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

1. **Green Belt, Policy 2, paragraph 4.3.15**

The Policy 2, paragraph 4.3.15 changes are clearly intended to provide the option in future to approve further development in and around the existing business park and I object to the proposal, to remove Send Business Park from the Green Belt in its entirety, for the reasons specified below.

1. The business park is already a non-confirming user in an area of outstanding beauty and natural amenity which runs alongside an area of the Wey Navigation rich in wild life. The proposed changes in Policy 2, paragraph 4.3.15 would remove the protection that the surrounding natural area is afforded by the current designation.

2. Tannery Lane which is the only access road for the business park would be unable to cope with even a small increase in traffic irrespective of that being an increase in number of daily vehicles using the road or in the number of industrial vehicles using the road. The road is width restricted in both directions for the majority of its length being single vehicle width and not suitable for the majority of its length for even smaller industrial vehicles to pass each other. The lane

3. The main access point into Tannery Lane is close to recreation area very well used by local children and an increase in vehicles using this area to access Tanner Lane would present a danger to the users of the area in particular children.

In conclusion I object to the proposed local plan and consider it to be unfit for purpose. The changes contained in the current draft which are impacting Ripley, Send Marsh and Send disproportionately, have been poorly thought out in terms of impact on critical factors such as flood control, traffic and local infrastructure, natural habitat damage and reduction in access to natural amenities for the population and critically have failed to provide an ‘exceptional circumstances’ justification for the removal of Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Policy A43**

I object to the Policy A43 change at Garlics Arch with particular reference to the specific points listed below.

Given the area is classified as Green Belt the A43 changes fail to demonstrate that an ‘exceptional circumstance’ exists which would justify development of this scale on a Green Belt site.

The increased development proposed under the A43 changes exacerbates the disproportionate size of the development in respect of both locality and the contribution to the overall target for new development in the wider Borough being assigned to the area. The number of homes now being proposed for the site represents over-development of the Send Marsh area and would result in the joining up of the villages of Ripley and Send which is fundamentally against ‘Green Belt’ principals.

The land represented in the A43 changes provides a valuable natural flood control in an area that already struggles with a high water table and periods of flooding in winter despite the installation of extensive flood control channels. The proposal to replace this natural area of flood defence with housing on the scale proposed in the A43 changes would further exacerbate flooding in the wider area to the detriment of the local residences and infrastructure and as such is at best a misguided proposal and at worst an irresponsible one.

The local road infrastructure is inadequate to cope with the demand of existing traffic further development as proposed in the A43 changes will overload the existing road systems to the point of gridlock and result in increased pollution exposure for the villages of Ripley, Send Marsh and Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Policy A58**

I object to the Policy change A58 at Burnt Common with particular reference to the specific point listed below.

1. **Policy A58**

I object to the Policy change A58 at Burnt Common with particular reference to the specific point listed below.
1. The proposal for the allocation of industrial of warehousing space at Burnt Common was deleted from the 2014 draft as a result of the level of local objection and the A58 changes fails to demonstrate that the re-instatement is justified.
2. The change in A58 wording from ‘maximum’ to ‘minimum’ allocation of industrial or warehousing space is misaligned with the overall decline in demand for industrial land, as evidenced by the fact that the existing and well established industrial and warehousing sites at Slyfield and Guildford remain under-utilised.
3. The 10 hectares of industrial and warehouse space being proposed for Send in the A58 changes is contraindicated by the reduction in demand for land allocated for this purpose published in the 2017 ‘Employment Land Needs’ assessment which showed only 3.9 hectares worth of demand for the entirety of the Guildford Borough. The A58 changes also represent an unjustifiable over allocation of industrial and warehouse land usage into one single Parish.
4. The local road infrastructure is inadequate to cope with the demand of existing heavy goods traffic and the further development as proposed in the A58 changes will overload the existing road systems to the point of gridlock, increase the traffic hazards that local Schools and GP practices already struggle with and result in increased pollution exposure for the villages of Ripley, Send Marsh and Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Dear Sir / Madam

Re: Local Plan Objections

1. I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford
2. I object to the building on the Green Belt at Send at Garlick's Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded.
3. I object to the exaggerated "housing need" figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.
4. I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford's urban brownfield areas much closer to existing transport hubs.
5. I object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the (A247) would be gridlocked all day.
6. I object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25.
7. I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.

8. I object to the development at Garlick’s Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks’ notice and without any prior consultation and is not required in terms of housing need either for the village or the borough.

1. I object to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available.

2. I object to the development at Garlick’s Arch because the site has a particular conservation sensitivity since it is covered in ancient Trees which existed in the 16th century would be endangered. The site is also subject to flooding.

3. I object to building 45 houses at Clockbarn because of inadequate access and traffic. Tannery Lane is far too narrow and bendy to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.

1. I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

2. I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

3. I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing Roads, doctors and schools will be unable to cope.

4. I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

5. I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to object to the following changes to the local planning proposal for the following reasons.

**Clockbarn Nursery, Tannery Lane Policy A42**

I object to the Policy A42 change at Clockbarn in Tannery Lane because you have increased the number of houses by 33% which is too much and ignores the hundreds of previous objections made by local people. If this goes ahead it will cause traffic problems in Tannery Lane and worsen the problems at the A247 junction, erode the Green belt in the village and worsen surface water flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: pslp172/929  Respondent: 11044257 / Corinne Waring  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

| Land at Burnt Common, London Road, Policy A58 |
| This development was deleted from the 2014 draft because of all the previous objections and the word 'minimum' is a change from the previous 'maximum' in the 20L6 plan. Since then, there has been a decline in demand for industrial land. There is no need to build an Industrial or warehouse development in the middle of Green Belt land, when there are empty sites at Slyfield and Guildford. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

| Comment ID: pslp171/103  Respondent: 11044257 / Corinne Waring  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
Green Belt, Policy 2 at paragraph 4.3.15

I object to the proposal to inset Send Business Park from the Green Belt because there is highly restricted vehicular access along Tanner Lane in both directions, further expansion or development at this location detract from the openness of the Green Belt and will ruin an area of outstanding countryside adjacent to the beautiful Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/834  Respondent: 11044353 / Michael Frayn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1369  Respondent: 11044353 / Michael Frayn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to new sites (Garlicks Arch) being introduced as an after thought when it was not even considered in the previous plan. A slip road on the A3 at Burnt Common has been added to the Draft Local Plan without Highways England consent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2815  Respondent: 11044353 / Michael Frayn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a totally unrealistic number of houses for the country lanes to absorb.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13761   Respondent: 11044353 / Michael Frayn   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY I1

The density of housing proposed cannot be supported by the existing infrastructure, and no provision has been made for the increased pressure on services. In particular the schools which are already over subscribed, and medical provision which can barely accommodate the existing population.

It is regarded as a necessity for households in rural areas to have two cars, more so in an area with a limited public transport provision, the resulting increase in traffic would place an unreasonable burden on narrow country roads, and exacerbate existing problems experienced by residents. The area is promoted as a location for the increasingly popular activity of cycling, which already causes frustration to current residents trying to go about their business.

New development is required to respect the character and density of housing in the area, and be limited by the availability if infrastructure and local facilities, the plan fails to do so.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2836   Respondent: 11044353 / Michael Frayn   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

POLICY P2
I wish to register my objections to the proposed development of sites in East and West Horsley on the following grounds:
The proposed development area lies within the Metropolitan green Belt, which the policy P2 undertakes to protect from inappropriate development. There is no justification for the removal of this protection of a rural area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/41  Respondent: 11044481 / Alan Davies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have read the plan, and am in general in favour. We also had the privilege of visiting the open day at the Council offices this past Saturday for a very constructive discussion.

In particular, the need for a greatly increased number of affordable housing, and maintaining affordable housing for the future, I see as very important. It is clear that the greatly needed increase in housing needs can only be met by building large scale developments which will also allow the Council to apply infrastructure demands on the developer.

I am in favour of development of the Wisley site - which I know well - and I have long thought it an obvious site for large scale development. Clearly, developments of this scale have large infrastructure needs in particular the A3 and increased bus and rail links. I support these proposals in the plan.

I don't see any plans to reduce car journeys, especially in the town centre, and would favour an increase in parking fees in the town centre, and reduced or no fees on the Park and Ride scheme, and am also in favour of congestion charging. Although I do understand that this is probably politically rather difficult.

All power to you for the plan development; 'keep the faith' and execute well. I will be writing to my MP (Anne Milton MP) to ask for her support for the A3 infrastructure development.

Thanks for the hard work so far.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I especially object to the proposed new building on the areas around Send and Ripley, not least the very recently added proposals for Garlick’s Arch and the new interchange at Burnt Common which do not appear to have had previous consultation. As made clear by many local residents in several consultations, the whole area has very constrained road infrastructure and limited local facilities. Several local lanes are already used as cut-throughs/rat runs both for cars and HGVs despite in many cases being only a single vehicle in width. And most simply cannot be widened. So simply building a large number of new houses without at the same time planning the whole infrastructure is frankly naïve and will only exacerbate existing problems. And in any case, I can find no mention anywhere in the Plan as to how it is proposed to ensure that such houses would indeed be affordable or how existing local residents would be given priority access. Without any such plan, the result would merely drive up the local population at a time when resources such as schools and healthcare are already overstretched.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I wish to register my opposition to the Local Plan.

In general I object to the proposed severe reduction in the Green Belt. This is not justified by the Plan, which includes highly dubious claims about housing needs but which, even if true, could be fully met using existing brownfield areas in and around Guildford which would in any case be much closer to existing facilities and infrastructure. And there is also a significant amount of land supposedly belonging to the University which does not appear to be considered for development, even for student accommodation. To attack the Green Belt now would destroy forever a valuable and attractive rural landscape which also supports essential wildlife and local recreational activity.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1878  Respondent: 11044513 / Jon Stranger  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a general observation, I and everyone I have spoken to feel seriously let down by Guildford Borough Council. Rather than serve the local population which has elected them, this Plan seems to have been developed without any mandate or declared manifesto and rides roughshod over local residents’ views and needs. And the fact that the video of ‘local people’ on your website is almost entirely limited to those with a political or commercial vested interest is a clear indication of GBC’s priorities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/570  Respondent: 11044865 / Phyllis Anne Mayers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

Dear Planning Committee

Whilst we completely relate to and understand the dilemma the Borough finds itself in particularly regarding the housing shortage, we strongly object to Send no longer being part of the green belt. We bought in this area because it was green belt and we could enjoy semi rural living and escape the busyness of the Towns and Cities. We cannot possibly understand how it can be justified building near the Wisley interchange, in close proximity to Send, which is already so horribly congested and when there is an accident it is mayhem on the A3, North and South bound routes. Not to mention Ripley high street being used as the diversion route to avoid accidents and rejoin the A3 just before Wisley.

All the wildlife - deer, foxes, rabbits etc - surely these animals need to be protected in all the wooded areas.

We are concerned that all the beautiful oak and other trees will also be cut down to create open spaces, completely destroying the current beautiful Surrey landscape, making it look like a concrete jungle.
We can agree to some increased housing but the scale being proposed is beyond what the existing infrastructure can manage, and any future changes to the infrastructure we believe will be insufficient to manage all the new housing.

Please do not destroy our greenbelt areas in Surrey, surely there are enough derelict brown sites standing empty that can be rejuvenated to cope with affordable housing opportunities and by doing so clean up and improve many ugly areas around Surrey.

Thank you.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is already significant traffic issues through Send, the road infrastructure in Send will be unable to cope with increased traffic

This is designated Green Belt and should not be developed, especially with so many Homes

We have concerns about the impact such a large industrial development will have, especially HGV traffic and light pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1040  Respondent: 11045185 / Paul Chapman-Hatchett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document: complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This is designated Green Belt and should not be developed, the woodland is one of the few areas left, that we can walk through and enjoy the Surrey Countryside locally.

Anecdotal evidence suggests this site has previously been a landfill site and not suited to the proposed development.(reference Policy A44 on pages 124 and 225**)

There is already significant traffic issues through Send, the road infrastructure in Send will be unable to cope with increased traffic

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1961  Respondent: 11045537 / Julian Keel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to express my grave concern about the proposed plans for development and removal of the Horsleys from the Green Belt.

My major concerns and objections are as follows:

1) The residents of West Horsley are totally opposed to the village's removal from the Green Belt.

2) West Horsley's Defined Settlement Area boundaries do not need to be extended at any point and no “exceptional circumstances” or justification for insetting these Areas from the Green Belt have been evident.

3) No sound reasons have been given for the proposed changes, which seem to be solely aimed at increasing land available within the settlements for future additional development.

4) The local infrastructure is already in overload. The local schools are full, medical facilities are stretched, the drainage is woefully inadequate and the traffic is already at high levels with roads in a dreadful state of repair.

5) The density of housing in the proposed development sites is several times more than the density of present dwellings.

6) Brownfield sites are not being developed ahead of these proposed new sites.

7) 2 versions of the Greenbelt Purposes Assessment were produced, in February 2013 and April 2014. Between the 2 versions, the score for contribution to the greenbelt was reduced for all sites in West Horsley without any explanation as to why. This seems a deliberate manipulation to the scores in order to downgrade to a low Green Belt sensitivity.

Please consider the above comments before the consultation period ends.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1) I object to the proposed changes of the settlement boundaries of the Horsleys into the Green Belt

2) I object to the proposed removal of the extended village areas from the Green Belt

3) I object to the proposed large housing development sites given that other avenues have not been considered and the local infrastructure cannot support these sites.
4) I feel that it is wholly unacceptable for Guildford Borough Council not to be protecting the Green Belt and putting short term gain before it's preservation for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6753  Respondent: 11045601 / Chloe Hartwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Services

Horsley's services are at breaking point already. Getting a prompt appointment at our medical centre can be difficult and their drop-in clinics always seem to be oversubscribed. The village primary school is oversubscribed, with many village children having to travel to other villages already. The proposed number of new houses/residents will have a knock on effect for the Howard of Effingham secondary school which has outgrown its current sight and plans to expand it seem to be being blocked. Such a huge number of new residents cannot be sustained without significant investment in these and other local services.

Infrastructure

Our roads are in an appalling condition already. I have young children and like to walk around the village with a pushchair as much as possible. This is already a hazardous occupation as the pavements are so narrow and letting my children walk, scoot or ride bikes is out of the question in some parts of the village. More people on our roads and pavements will be dangerous and cause accidents.

Whilst parking at our local conveniences is currently adequate, with more local residents this would become a problem.

I understand that you have been advised by Thames Water that our waste water drainage system is already under strain and this can be seen each time we have heavy rainfall. Localised flooding is common as the drainage system is not able to cope.

Huge investment is already required in these areas, before even small housing developments can possibly be considered.

Pollution

My husband and I moved to West Horsley from London in order to escape the pollution levels, we specifically chose a small village for this reason. I object to this small village being turned into a town, being taken out of the Green Belt, and the levels of pollution which would thus ensue

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6754  Respondent: 11045601 / Chloe Hartwell  Agent:
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**Transport**

It should be a prerequisite that Southwest Trains provide more trains to/from Horsley into Central London if these developments go ahead.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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**Green Belt**

West Horsley is situated within the Green Belt and on the edge of the Surrey Hills, a Site of Special Scientific Interest. Taking the village out of the Green Belt, and building such a huge number of houses, both in Horsley and Wisley Airfield, will have an enormous impact on these delicate areas. The increase in the number of people and in particular dog walkers and horse riders, using the SSSI will have an enormous negative impact on such a special environment.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Number of New Houses Proposed

Whilst we must all take our fair share of new housing to meet the current demand, the number proposed for West Horsley seems vastly out of proportion when the size of the village is considered. I understand that it will be a 35% increase in the number of homes in our small village. This is not sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4398  Respondent: 11045665 / Graham Bannister  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is no way that our already overstretched infrastructure can support the additional population the proposed development will bring in. The roads in the area have not been maintained in recent years and would not support the another in flux of thousands of new vehicles not to mention the destruction caused by heavy goods traffic. Developers traffic has already damaged many of the roads locally.

Schools and medical facilities are already close to breaking point. How are they expected to support a potential 30-40% increase in demand.

I have lived in this village for most of my life. I have watch the village expand slowly. I believe that the huge amount of the proposed development that is planned for this area will decimate this village.

I oppose the removal of the Horsley’s from within greenbelt. The local plan is potentially vague and duplicitous there appears to be very little boundary to the level of development that could happen here. For example, I note that the few shops a centre of the village is designated as a district centre. Horsley is not district it is a village, not only does this suggest that Little attention has being paid to the nature of our community but I also understand it opens the door to further urbanisation and development. I am opposed to the reclassification of this area.

The proposal for building houses within only very few miles of this community, at Wisley airfield, Garlick’s arch, burnt common and Gosden Farm is appalling. This would eradicate all semblance of village life and potentially merge all local villages into Guildford and create a sprawling mass of unaffordable housing.

There is no denying that housing is sorely needed in this country but it needs to be planned carefully with all of the needs of existing and future communities taking into account. There is nothing to suggest that any of this has been considered in the current plan. There is a general lack of transparency there is language used that is vague an ambiguous. There is no explanation for why developers need to build only on virgin Green Field sites besides the obvious one that it’s much cheaper for them to do so. There is little to suggest that any of the housing will be affordable. There is very little to suggest that any new investment will be found to create an infrastructure that would support the huge increase in population and traffic. There is very little to suggest that any of this development Will benefit anyone except those investing the development. As I understand development in Wisley is being operated by an overseas company, so even the profits made from such rash development would not find their way to help the people of this country.
I appreciate you taking the time to read this letter. It serves as my complete opposition to the new local plan. I hope that you consider the points I’ve raised as this is a once-in-a-lifetime opportunity there is no turning back once this beautiful countryside has been destroyed it cannot be returned. Please do not continue with this Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/17894  Respondent: 11045665 / Graham Bannister  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

65% of the housing proposed in the new plan is on green belt. We are lucky enough to live in a beautiful part of this country but not for much longer if proposed developments go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3565  Respondent: 11045697 / Nick Hartwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am a homeowner in West Horsley and concerned on the potential impact to our village adding in a further 385 homes, some 35% increase on the current housing stock. I fully appreciate we live in the south east of England and further housing is needed but surely a more balanced approach with consideration to the existing infrastructure/services and built environment of the village is required before the Horsley’s become part of the urban sprawl along the A246.

One of my biggest concerns is that of impact on local essential facilities such as schools, doctors, shops of which there is limited detail. My son has only by the skin of his teeth got a place at the local state school which is a joke being less than a mile away. If all the new homes were built I doubt this would have happened which is ridiculous for a small village. Getting appointments at the doctors is very difficult at short notice and there is no provision for improvement of the current medical facilities. Infrastructure is already poor and congestion would dangerously increase and be a hazard for all users – the pavement provision is very poor and I often have to walk in the road with my two children in our pushchair.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I am totally opposed to the village’s removal from the Green Belt by insetting and extending the 2003 Local Plan Settlement Area Boundaries. This seems madness for ecological reasons and also will change the face of the village for ever. The defined Settlement Area boundaries (ref 2003 Local Plan) do not need to be further extended. Over development will destroy the character of the area and deter what recreational visitors we have left (cyclists and walkers). Also the Guildford Borough Economic Strategy 2013-2031, makes no case for locating large numbers of homes in East and West Horsley or indeed the neighbouring villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Policy S2 plans for 13,800 new homes in Guildford’s villages. This is massively too high and unsustainable. West Horsley has barely any services and a 22-25 minute walk from the station with a infrequent local bus. How on earth this can be deemed suitable for a 35% increase in housing stock surely cannot be truthfully justified? Policy i3 lacks any substance in this regard and is in commercial reality unlikely to be improved so therefore a major flaw.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Letter objecting to the proposed submission Local Plan: Strategies and Sites June 2016

I want to voice my objection to the proposed 385 new homes being built in West Horsley in the Guildford development plan. For the village this would mean a 35% increase on the current housing number of 1,111. This is a small village, which does not have the capacity to accommodate an additional 700 cars, another 2000 people all who need healthcare, and schooling and infrastructure to support this level of immigration. As the proposed plan is to build these by 2022, this will radically alter the village and it is unsustainable. This proposal in isolation might not be too bad if we didn't take into account the additional 2000 houses proposed at the Wisley site, which was refused in 2016 by the planning office, the 148 houses proposed for East Horsley, and the large development of 2000 houses just down the road at Gosden farm in Burpham. What you are proposing to do is a travesty; Surrey will no longer be the green belt area it used to be if this plan is allowed to go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1453  Respondent: 11045729 / Samantha Wigfall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Just because the villages in Surrey have relatively good transport links to London does not mean they should now try to support significantly more people than the infrastructure can handle, at the end of the day we know this is about making money and not about providing affordable housing for the youngsters of tomorrow. Do we want to live in a country like the USA where the ecological consequences of low-density suburban living are becoming more obvious year on year (The House of commons briefing paper Number 00934, 5 January 2016) Tristan Hunt stated that economic factors are significantly depleted by uncontrolled urban sprawl and really is this the legacy we want to give to Surrey in the future?

The Raleigh school has just posted a letter through my door stating that they wish to move to a Greenfield site on East lane, replacing the existing school so that housing can replace the old site. Currently I live adjacent to this school, it is currently a great school on a nice plot that has access to open areas for children to play at break time, and Weston Lea for sports days etc. If this proposed plan goes ahead it will mean the selling off of Weston Lea, so no school sports day facilities, and the site proposed for the new school would mean the whole of East lane would be blocked to traffic during school pick up and drop off times, just like Glenesk school, rendering the whole village a no go zone for all concerned. At least currently it’s only outside of my house on Northcote Crescent that is a real burden on the community. It is true that the school is at capacity and has been for many years, the plan mentions providing additional classes each year to accommodate the influx of pupils by the new housing developments, which the current school cannot accommodate in its current state. If the new houses were given planning permission it would impact both the Raleigh and the Howard of Effingham. There are no details of how traffic will be managed in the plan, improvements to existing roads which are atrocious currently, or any
increase in local infrastructure such as doctors surgeries, improvements to water drainage, internet improvement, or mobile phone facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I want to vehemently object to the villages being inset from the green belt.

In the Guildford plan section 4.3.12 it states "Historically all the villages, except Ash Green, and major previously developed sites have been washed over by the Green Belt designation. However, the national planning policy states that only those villages whose open character makes an important contribution to the openness of the Green Belt should be included in the Green Belt. Those that do not should be inset, or removed, from the Green Belt and other development management policies used to restrict any inappropriate development". According to the National Planning Policy Framework (NPPF, 2012) there are five stated purposes of including land within the green belt: to check the unrestricted sprawl of large built-up areas, to prevent neighbouring towns from merging into one another, to assist in safeguarding the countryside from encroachment, to preserve the setting and special character of historic towns, and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

In fact the UK government encourages local authorities to protect the land around the towns by creating green belts, and not to build on them. By insetting the villages you are effectively disregarding the government policy to protect urban sprawl, not safeguarding the countryside, and not preserving the character of the villages in this area. Who has decided that West Horsley and the other villages mentioned in the plan do not make a significant contribution to the openness of the greenbelt?

This is a village and should remain a village at its current size, and not be inset by the plan to accommodate the greed of the property developer, it should remain in the greenbelt as it is a beautiful village to live in and it should remain so. Lets face it, putting a quarter of the homes designated for development in greenbelt villages in one village is too much and should not be allowed to happen. Please listen to our concerns and not allow developers to make significant revenue for themselves at the expense of destroying village life in Surrey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I object to the proposed new housing numbers. The Strategic Housing Market Assessment mathematical model has not been revealed in the plan. I am therefore confused as to how a population increase in the Borough, which is estimated at 70% higher than the official national estimates is calculated?</td>
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<td>I object to the Development of over 2000 house village at Ockham (former Wisley Airfield). The impact on the Horsley villages of such a huge mixed housing, retail, commercial, traveller and schools development, under 2 miles away would be enormous.</td>
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<td>I object to Station Parade being designated a <em>District Centre</em>. This is a misreading of the nature of the facilities in the village centre and would inappropriately target the area for future urban development.</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is no mention of scope to improve infrastructure which is already overloaded. Local Schools are full. Medical facilities stretched. Drainage is inadequate, roads and car parks are overloaded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the Proposal to remove the Horsleys from the Green Belt. The exceptional circumstances required before taking this action have not been demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the Extension of the boundaries of the Settlement area of the Horsleys; no sound reasons have been given for the proposed changes which seem to be aimed solely at increasing the land available within the settlements for future additional development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
### Comment ID: SQLP16/331  **Respondent:** 11045953 / Victoria Palmer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed development as a local resident and feel that Send already suffers from too through traffic between Guildford and Woking

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

### Comment ID: SQLP16/332  **Respondent:** 11045953 / Victoria Palmer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Send Village being removed from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

### Comment ID: SQLP16/333  **Respondent:** 11045953 / Victoria Palmer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to building houses at Clockburn Nursery & Garlick's Arch

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/334  Respondent: 11045953 / Victoria Palmer  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to development of more houses in Potters Lane, as it is already subject to enough through traffic between Guildford and Woking using it a 'rat run' to avoid the using the A247 between burnt common and The New Inn

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/335  Respondent: 11045953 / Victoria Palmer  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I believe the proposed new interchange will add to the traffic using the A247 as a short cut to avoid hold ups which are quite frequent between the A25, M25 & the A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt, which provides sanctuary for many wildlife species. There is ample brownfield land in the urban areas which requires regeneration, without the need to encroach on protected Green Belt land. The election manifesto promises to the electorate are being ignored.

1. I object to the proposal to remove the Horsleys from the Green Belt. The so called "exceptional circumstances" required before taking this action have not been demonstrated. Estate development would overwhelm the area, and would not be in keeping with the character of this unique area. With regard to the proposed development at the allocated area A39 site would be unnecessary, as this would add to the already dense overdevelopment in the area, causing an urban "sprawl", affecting Horsley's picturesque image, also the proposed access road on Ockham Road North is inadequate, and would create traffic issues.

1. I object to the proposal to remove the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. This planning application has already been unanimously rejected by GBC’s Planning Committee, who cited the same concerns highlighted in this letter.

2. I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

5. I object to the huge impact on transport, local roads, road safety and polution. I especially object to:
   * The assumption that the proposed developments will result in a shift from driving to cycling and walking. The FWA development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars. There is also another assumption (and the taken for granted) that the other proposed developments nearer to Effingham Junction and Horsley stations will result in a reduction in car traffic. This will not be the case if people are required to travel regularly to areas around Guildford, Woking and the M25.
* The increased volume of car traffic. The proposed development in these areas would result in an estimated 4,000 additional cars on the roads.

* The danger this traffic will be to local cyclists and pedestrians, due to no cycling paths and the lack of pedestrian footpaths, and the space to provide them!

* The increased volume in car traffic will increase unnecessary pollution for residents.

6. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

7. I object to the fact that the proposed Local Plan which will affect the local communities has not been taken into consideration, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

1. I object to the impact the Local Plan will have on the already overstretched primary and secondary school places. The Raleigh School and The Howard of Effingham schools are already both at capacity. Surrey County Council has published no plans for creating further school places for children of all ages.

9. I object to the Local Plan not taking seriously the advice that Thames Water has given to Guildford Borough Council that the current wastewater network in this area is unlikely to be able to support the demand anticipated from all of these proposed developments. The foul drainage system all the way to the treatment works north of Ripley, will need to be upgraded to cope. There are serious concerns about these sites which have also been raised by a broad number of authoritative sources across the UK, including Highways England, NATS and the Environment Agency.

I am concerned about the proposed housing targets which has been allocated to Guildford Borough and the South East in general. I appreciate that new homes are needed, and that is the plan up and down the country, but the greenbelt is meant to provide a limitation on the inexorable growth of London. Keeping the greenbelt is so vital and beneficial for all, especially for future generations, to enjoy. I really hope that all brownfield sites take all priority in all areas, before the greenbelt is ever considered.

I trust that these objections will be fully considered and the Allocations at the Former Wisley Airfield, A35, A37, A38, A39, A40 and A41, are removed from the Guildford Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3834  Respondent: 11046561 / Michelle O'Dell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Having studied the submission plan, I find it is unsound due to the large number of errors in the plan due to the poor quality, considerable lack of transparency/clarity in the evidence, and the inaccessibility of evidence for those who are not able to open the huge files being sent due to poor internet connections.

I require confirmation that all of these comments together with all my previous comments are passed to the Inspector. I reserve my right to appear at the inquiry and present my evidence.

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for the reasons listed -:

1. It is the least sustainable strategic site identified in both this version and the previous versions of the plan because of the constraints on the site and the actual location.
2. It is further from railway stations than any other identified site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)
4. Local roads are already at capacity especially when there are roadworks, diversions etc on the SRN.
5. I object to the transport evidence including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable
6. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.
7. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
8. Any public transport bus services provision to Horsley will hugely impact the safety of the local road network as the winding, partly unlit lanes are not wide enough to accommodate PSVs. The assumption that people will walk or cycle on a regular basis on these lanes is unsafe and unreasonable.
9. There is no evidence of sufficient employment available on the site, therefore almost all residents will have to travel to get to work.
10 The failure to address the impact of increased traffic does not address travelling to Woking rail station.
11. I object to the increased area of the site as this now abuts additional heritage assets, including Upton Farm and Bridge End House negatively impacting the setting of these buildings and the wider Ockham Conservation Area.
12. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
13. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
14. I object to the removal of additional 3.1 ha from the green belt without any justification
15. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact
19. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.
20. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
21. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

22. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

23. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

24. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

25. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

I consider for all the reasons listed above that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2087  Respondent: 11046593 / ANGELA GUNNING  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Finally, we are calling on the Council to be transparent and provide a full and detailed analysis of our development SHMA targets. We believe that a good development plan is integral to this Borough’s future and that our residents will support developments where transparency exists and all other options have been considered and exhausted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8765  Respondent: 11046593 / ANGELA GUNNING  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We are calling on the Council to increase the land allocated for offices and manufacturing. We envision Guildford Borough to be a city in its own right and go beyond the commuter town envisaged by the current Executive Committee.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8764  Respondent: 11046593 / ANGELA GUNNING  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We are calling on the Council to evaluate high-rise, high-density buildings within the centre of Guildford before allowing development in the villages and in the Green Belt. Woking is a good example where multi-story buildings blend in to the city’s life and provide a young and vibrant population.

We are calling on the Council to provide innovative housing accommodation for our young professionals such as purpose-built Multiple Occupancy Houses. Where the Local Plan identifies such accommodation may be created, we ask the council to use the Council’s building company to provide such accommodation for our residents.

We are calling on the Council to provide social housing that addresses our current needs instead of mandating a 40% quota of affordable housing which may well not suffice. The “affordable” housing proposed by the Local Plan is not affordable for most of our residents.

We are calling on the Council to provide accommodation suitable for our ageing population also and include policies that protect the existing bungalows used by our older residents.

We are calling on the Council to ensure decent living standards for everyone by mandating that the 12 Building for Life principles apply to every housing development and only by exception allow developments not to meet these standards

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8769  Respondent: 11046593 / ANGELA GUNNING  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
No development can be sustainable without the right infrastructure supporting it. In this we support the Council in ensuring that infrastructure is created alongside or before any development. We are also calling for innovative approaches to providing the required infrastructure such as working with existing GP services to expand current premises or create additional GP branches to support the increased development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8768  Respondent: 11046593 / ANGELA GUNNING  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We are calling on the Council to put forward a travelling and commuting scheme that encourages and promotes the use of public transport over car usage. We are calling for the areas to be pedestrianised and for more cycling lanes.

We support the Council’s plans to redevelop the bus station and make it a station our residents can be proud of.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8766  Respondent: 11046593 / ANGELA GUNNING  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We strongly support the protection of all Areas of Outstanding Natural Beauty and oppose any changes and development that may erode the character of AONB.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8763  Respondent: 11046593 / ANGELA GUNNING  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A lot of work has gone into the Local Plan. It is obvious for anyone who has read through the Local Plan that the Guildford Borough Council’s civil servants have done an excellent job with the brief that were given. Unfortunately the brief does not address the borough’s needs adequately.

The situation we find ourselves in and in need to remediate is the result of the short-sighted 13 years of Conservative leadership of the GBC. We are in need of housing, both social as well as for the professionals in low to average income jobs that support Guildford’s borough; nurses, police officers, retail workers, bus drivers and a raft of other professionals struggle to find affordable accommodation within Guildford. This results in most of them living outside Guildford and commuting into town, resulting in part in the traffic gridlock most of us experience on a daily basis trying to traverse the city centre. The policies put forward by the GBC do not address the needs of our Borough.

We are calling on the Council to respect the nature and character of our villages and impose a maximum development target of 20% housing every four years (of the total number of houses envisioned in the Local Plan).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** SQLP16/235  **Respondent:** 11046593 / ANGELA GUNNING  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Para 2.5 'pockets of deprivation'. The official definition may well include both income and crime, but they are not cause and effect. I understand that cyber-crime is one of highest incidence in Surrey. The point of this paragraph presumably is to highlight the wide disparity of income in the borough, and which is a major cause of the demand for social housing. These three paragraphs could be reworded to reflect that rather than talk of ‘deprivation’. Some data showing the wide distribution of income across the borough would illustrate the point more effectively.

Policy H1 - Homes for all. There is no explicit mention of bungalows - basically one-storey properties. These are essential for residents with mobility impairment. I suggest the policy includes words to the effect that we will not look favourably on planning applications which seek to demolish a bungalow/s - in order to replace with one or more properties with upper storeys -unless there are genuine and compelling reasons to do so.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPA16/2475  **Respondent:** 11046721 / Judith Shaw  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
As residents of Normandy for over 30 years, we write to object to the GBC Local Plan 2016 for the following reasons:

- We see no justification or 'exceptional circumstances' for Site A46 to be released from the Green Belt. There has been no explanation why development has to be on this red sensitivity status site.
- The local roads are already overstretched and have been steadily deteriorating over many years. The development will increase pressure on the traffic from Normandy towards and across Guildford on the A3 and other local roads, which is already a nightmare, resulting in longer and longer 'peak' hours at each end of the working day. Public transport never has been or will be an adequate substitute. The railway under and over bridges on Westwood Lane and Glaziers Lane are a constraint on the flow of traffic and considered unsafe due to inadequate sightlines.
- There is no current need for a new secondary school in this area and may only be required if the development is permitted to proceed. At present, we are adequately served by the existing secondary schools whereas the primary schools are under tremendous pressure.
- Other amenities in the village would not be able to meet the increased need produced by the additional population.
- There has been no consistent application of considerations of sustainability and sensitivity as applied to Normandy and Flexford. They are treated as one settlement when assessing sustainability but treated separately for sensitivity.
- We have been seeing far fewer species of birds and small mammals over recent years and the proposed additional households means even more dogs and cats in the area, increasing predation of wildlife.

The plan is considered unrealistic and would result in the destruction of our rural environment and we wish our views to be taken into account.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. Tannery Lane is too narrow to cope with houses being built at Clockbarn Nursery. The junction is already difficult to navigate and more traffic will make it impossible, especially at peak times. There is existing planning permission for the marina at the Tannery and 64 apartments. The infrastructure of Tannery Lane will struggle to cope with this without any further developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5420  Respondent: 11047169 / Margaret Sherborne  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
Answer (if comment is on questions 1-7 of the questionnaire): ()  

1. I object to a large development at Garlick’s arch because it is a flood zone and is covered by ancient woodland. Guildford’s housing requirements have been shown to be grossly exaggerated and they have refused to disclose their calculations, With proper use of brownfield sites this Green belt site is not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5424  Respondent: 11047169 / Margaret Sherborne  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
Answer (if comment is on questions 1-7 of the questionnaire): ()  

1. I object to a new interchange with the A3 at Burnt common as it would encourage southbound traffic to leave at burnt common and use the already overloaded Send Road through Send village, causing it to become gridlocked.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5422  Respondent: 11047169 / Margaret Sherborne  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object the development on houses and traveller’s pitches on Send Hill. The subsoil of the site contains documented unsafe landfill waste registered at GBC so this should eliminate this area for development with no other reason. As a caravan owner I am already aware of the narrow road with single width access and need to avoid certain times a day if we have our caravan in tow. It would be inappropriate to encourage more caravans to have to navigate it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10873  Respondent: 11047169 / Margaret Sherborne  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I should like to make the following comments about the local plan and it’s relevance to Send.

1. I object to Send Village being removed from the green belt. The green belt was intended to be permanent, as required by the national planning policy framework, and there are no special circumstances to justify abandoning it. Send’s green belt provide an essential buffer between Guildford and Woking stopping them becoming a continuous built up area. Local councillors and central government gave a clear election promise to protect the green belt and this reneges it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4139  Respondent: 11047201 / Peter McGowan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The points that I raise with respect to traffic problems under "I object to a new interchange with the A3 at Burnt Common" apply to all of the development proposals above as they will all result in additional cars on the road in and around Send. I would also point out that it is the norm rather than the exception that at peak hour, a commuter into London from Woking will not obtain a seat on a train. It is also common for trains to be delayed due to faults with infrastructure. Season tickets and car park tickets are expensive. I can only imagine how the situation will deteriorate further as a result of the above proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4138  Respondent: 11047201 / Peter McGowan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to building 45 houses at Clockbarn Nursery. Tannery Lane is an inadequate thoroughfare to access this site due to its narrowness and bends. It currently already supports heavy traffic. Often it floods. The junction with Send Road is hazardous now. On top of all the foregoing, heavy traffic will be generated by the proposed 64 apartments at the Tannery and the building of the marina.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4135  Respondent: 11047201 / Peter McGowan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to building 400 houses and 7000 sq metres of industrial space at Garlick's Arch, opposite Send Marsh Road. The site is inappropriate because currently it is covered by ancient woodland and because it regularly floods. This proposal represents poor planning and management because existing brownfield sites in Slyfield and elsewhere could be used. Furthermore, I understand that the industrial space proposed is not actually needed. The proposal to build 400 houses seems extraordinary in terms of the lack of transparency over the data that supports building this number of houses in this location. I would be grateful if clear data could be presented to support this plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to a new interchange with the A3 at Burnt Common. This will have little effect on the traffic flow in the area in terms of dissipating congestion which at peak hours often extends from the A3 through Ripley and up to the roundabout at the Little Waitrose store in Send. Similarly traffic travelling in a south easterly direction towards that roundabout frequently extends all of the way through Send village to the New Inn. I commute to London for work each working day and park my car at Woking train station. This traffic congestion has not always existed but has become worse each year over the last 16 years. The average time of the trip from Send to Woking takes longer each year. Frequently there are roadworks and temporary traffic lights in place. One can only imagine the congestion and damage to infrastructure that will result if 400 homes are built at Garlick's Arch, 45 houses are built at Clockbarn Nursery, 40 houses are built at Send Hill, 2000 houses are built at Wisley Airfield, 200 houses are built at Gosden Hill and 1850 houses are built at Blackwell Farm. Much of the traffic from surrounding areas would travel through Send. Noise and pollution levels would rise and degrade residents' amenity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Send Village being removed from the Green Belt. The Green Belt was intended to be a lasting arrangement under the National Planning Policy Framework. There are no exceptional circumstances that warrant departing from that arrangement. Send's Green Belt provides an essential buffer stopping Woking and Guildford comprising one conurbation. It is a betrayal of the trust that was placed by residents in local councillors and central government who gave clear undertakings to protect the Green Belt. These proposals represent a breach of representations made to, and the mandate given by, residents who elected them. The Green Belt is a safe haven for a diverse range of wildlife. I have observed over the 16 years that I have lived in Send how this wildlife has been eroded. For example, it is clear that plants and animals such as the English oak, the adder, the song thrush and toads are less numerous than when I first came to live in Send. Removing the village of Send from the Green Belt will further limit the ability of these and other wild lifeforms from using the area as a habitat, if not exclude them from the area altogether. Removing Send from the Green Belt will also result in a loss of amenity to residents, many of whom live in the area as young families or retirees, or who otherwise as residents take pleasure from its semi-rural/rural setting and surrounds. This proposal, if successful, will without doubt result in extensive development that will destroy forever (a) the personality and fabric of the village and (b) in turn, the lifestyles and amenity of residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1217  Respondent: 11047201 / Peter McGowan  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Finally, I am concerned to read reports that there may be laws or regulations that may have been breached or may be breached as a result of the making or implementing of the above proposals. If in the unfortunate case that there are such breaches involved in these proposals then residents obviously also reserve their rights to pursue whatever legal remedies or actions that jointly or individually may be available to them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1227  Respondent: 11047329 / Hazel Corstin  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
1. **APPENDIX C**

I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/1226  **Respondent:** 11047329 / Hazel Corstin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
1. APPENDIX D

I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The "objectively assessed need" figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford.

I object as this local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY A25 - Gosden Hill Farm

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).
The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

I object as a new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. POLICY A43 AND A43a – Garlick’s Arch

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council’s eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.
Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

I object as it is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY D3**

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/4878  **Respondent:** 11047329 / Hazel Corstin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY D3**

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/4879  **Respondent:** 11047329 / Hazel Corstin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **POLICY D4**

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/4868  **Respondent:** 11047329 / Hazel Corstin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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1. **POLICY E1**

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.
I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. POLICY E5

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4881  Respondent: 11047329 / Hazel Corstin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

I object because Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4877  Respondent: 11047329 / Hazel Corstin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

I object as the housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. **POLICY H2**

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/4880  **Respondent:** 11047329 / Hazel Corstin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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1. **POLICY H3**

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses through all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. **POLICY I1**

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and The Clandons are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper or any pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

I object as without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4873  Respondent: 11047329 / Hazel Corstin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY 12

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen.

I object that the draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

I object as there is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY ID3**

I object to poor air quality concerns (Policy ID3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY P2**

I object to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.
The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

I object as Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned.

I object as The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages.

In particular I OBJECT to the settlement boundary put round East Clandon with no reference to the residents or the Parish Council.

Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.
Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4882  Respondent: 11047329 / Hazel Corstin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4867  Respondent: 11047329 / Hazel Corstin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY P4**

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. **POLICY S1**

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)
The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY S2

I object to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

I object because the housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

I strongly object as these concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

I object as the plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these...
adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

I object to the Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly.

I object because the Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

I object because the development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

I object because it is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

I object to the proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) as they will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities. The impact on the surrounding highways and roads will be hugely significant and extremely damaging.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Questions from GBC

24.A. Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

ANSWER

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24.B. Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant? Please provide the following information being as precise as possible:

- why you consider it is or is not legally compliant and
- what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

*Comment ID:* SQLP16/850  *Respondent:* 11047329 / Hazel Corstin  *Agent:*

*Document:* Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24.C. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

ANSWER
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites— which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and
foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/851  Respondent: 11047329 / Hazel Corstin  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24.D. Question 4: Duty to cooperate

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

• why you consider it has or has not complied with the Duty to cooperate and
• what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.
The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp173/698  Respondent: 11047329 / Hazel Corstin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (

11. In policies SRN9 and SRN10 I note the change in responsibility for delivering new A3 slip roads at Burntcommon from Surrey County Council to either Highways England or developer. I have concerns that if delivered by Highways England alone there would be no local level control over if/when/how the scheme was delivered. This is an existing concern for other schemes including SRN2 and SRN3 (Stoke interchange and M25 J10/A3 interchange), where Highways England have sole responsibility.

12. I also have concerns over the changes in funding in policies SRN2 and SRN3. While I strongly welcome developer ‘funded’ (which implies more financial commitment than ‘contribution’) for road network improvements which are required as a direct result of new housing, I am concerned this may lead to a reduction of the affordable housing percentage delivered (which should be 40% in most cases). This concern is in part due to a change in Section 4.2.40, where there is in our view some softening of the language around the issue of developers needing to demonstrate lack of economic viability of affordable homes in order to reduce their standard quota (40%). This concern applies to other developer funded projects including Wisley cycle networks.

13. Furthermore, given the delivery dates of some policies (scheme E31 talks about widening the carriageways from 2023 at the earliest), and given the current economic conditions, can The community expect the schemes to be delivered on time/at all, and will they already be out of date when realised?
14. I note that the local road strategy allows for 30 electric car charging points, but I would suggest that this is likely to be an underestimate in the coming 20 years, given the rapid increase in acceptance and adoption of electric/hybrid cars in recent years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4003  
Respondent: 11047329 / Hazel Corstin  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6. I object to Policy A25 Gosden Hill Farm, in that even though housing numbers at this site on the surface seem to have been revised slightly downward to 1700 from 2000, in actual fact the wording in Policy A25 now states ‘Approximately 2,000 homes of which a minimum of 1,700 homes will be delivered within the plan period’. This seems to be attempting to indicate a change which in reality may not exist, and is misleading.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4004  
Respondent: 11047329 / Hazel Corstin  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7. I object to site A35, Former Wisley Airfield, as the overall area of the site has increased to 95.9 ha, which implies loss of more open countryside to development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4005  
Respondent: 11047329 / Hazel Corstin  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8. I object to site A58 Burntcommon, which has now become a ‘Strategic Employment Site’. The overall burden on Send (and West Clandon) of the minimum of 7000sq m of industrial space (i.e. could be much larger) is greater than the now deleted up-to 7000 sq m from the neighbouring site A43 Garlick’s Arch. This is a net gain in traffic and congestion in this area. The proposed insetting of Send Business Park from the Green Belt indicates GBC’s increased emphasis and ambition for growth of this village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2083  Respondent: 11047329 / Hazel Corstin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to a number of issues in the ‘Proposed Submission Local Plan (2017)’ which have changed since the previous ‘Draft Local Plan 2016’. In addition I would like to state that the original objections to the 2016 plan remain. I still believe that this deeply flawed Local Plan will have a direct and detrimental effect on the amenity currently enjoyed by residents of East Clandon and to the even greater detriment to our neighbouring villages of West Clandon, Ripley, Send, West and East Horsley. The plan erodes the openness of the Green Belt and endangers the beauty and views in and out of the Surrey Hills AONB.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2084  Respondent: 11047329 / Hazel Corstin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to Policy S2 for the proposed provision of the very high overall housing numbers of 12,426 new homes, which is only a small reduction on the previous figure of 13,860. These numbers are still based on an overly high-growth economic development plan which in itself has had no direct consultation with any residents. They remain too high as shown by an objective assessment made by the report made for the Guildford Residents Association (GRA) by Neil MacDonald (independent adviser and commentator on housing demographics).

2. Also in Policy S2 housing numbers, I object to the fact that downward economic pressures (including Brexit) have been adequately accounted for. Additionally in Policy E1, E2 there is too much emphasis is on providing retail and commercial in Guildford town centre, when the pattern of business is changing and more town centre housing is needed rather than retail. This would ease the pressure on housing on the Green Belt.

3. I object to the population growth figures in section 2.3, which have actually increased by almost 5000. By returning to a 2014 evidence base, I feel this does not account for more recent political and economic changes.

4. Furthermore, I object to Policy S2 because I believe the 12,426 homes includes estimated demand from London, and also now possibly from Woking’s perceived unmet need, and I feel Guildford will become a dormitory town for London and the surrounding areas, rather than meeting the needs of residents of Guildford Borough.

5. I object to the fact that in Policy S2, despite the afore mentioned slight apparent reduction in overall housing numbers and industrial space, the reduction is mostly in Normandy/Flexford and the load on the East of the borough is still disproportionate and has even increased.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14364  Respondent: 11047425 / Ian & Karen Pollard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan involves moving the current Greenbelt boundaries and the Greenbelt is one of the main reasons why this area maintains its rural charm and character, particularly just outside the M25. If the proposal goes ahead then the Greenbelt land will be lost forever and our inheritors will be denied these benefits and be thrust into an increasing metropolitan mass.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14366  Respondent: 11047425 / Ian & Karen Pollard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Housing.

The scale of housing proposed will severely impact road congestion and the use of local amenities. The proposed growth is anything but organic and would require a fundamental review of amenity availability and use, which is lacking from the current proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/697  Respondent: 11047585 / Mark & Julia Way  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14528  Respondent: 11047681 / Robert Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Transport

The rural location of these sites necessitates the use of a car.

Public transport links within the two villages rely on a very infrequent bus service, and the train line.

The train station has no step-free access for trains running London bound, or returning from Guildford, limiting accessibility to those who find a bridge restrictive (such as the frail or elderly) and preventing access for those in wheelchairs or with small children who require prams and buggies. The advertised step free access route per national rail requires getting off at a stop early (or late) and 'catching a taxi from Clandon'.

Access to private transport, such as a car, is therefore a necessity for anyone in these groups.

Even for those who walking over a bridge is no impediment, the lack of sufficient amenities within the village mean that frequent travel out of the village is required (for food, leisure etc) which undoubtedly will require a car.

Even more significant is the development on Wisley airfield. The site is largely isolated from public transport, without any pedestrian or dedicated cycle routes to the train station. The significant majority of residents would need access to a car.

The volume of additional cars from these planned developments will increase road usage and the following infrastructure improvements would be required as a minimum:

Access to the villages is through two routes: ‘The Street’ through West Horsley and B2039 through East Horsley. Both of these roads have stretches where the road narrows to such an extent that there is not sufficient space for two highway lanes, and road markings disappear. In order to allow the higher volumes of cars pass one-another, the roads will need to be widened to accommodate the increased volume of traffic.

A3 junction. During rush hour (between roughly 7am to 9am Monday to Thursday during term time), the stretch of the A3 northbound between the Wisley junction and the M25 exit frequently ceases to a halt under the weight of traffic. This has a knock-on effect to the northbound side of the A3, with traffic extending south beyond Burpham. Cars joining at this junction and not wishing to join the M25 have to filter across the traffic looking to exit, which contributes to the congestion. The additional high volume of traffic joining as a result of the proposed developments will result in further delays. This junction will need major improvement works to prevent sever disruption to the highways.

Drainage / Sewerage

The sewerage within the village already experiences problems, and investment will be required to accommodate additional discharge from the high density developments. Some improvement works are scheduled but will not commence before the proposed housing development is in place. The proposed plans do not address this issue or how they will prevent any nuisance before or during the improvement works have taken place.

Flooding

There are areas within the village which are within flood zones 2 and 3, measures are required to ensure current housing does not become more prone to flooding, and water can drain freely (see drainage above).

Car parking

Car parking is restricted in the village, often resulting in difficulty to find a space outside the village shops. The extension of an additional 35% housing will require corresponding increases in the car parking provisions within the village (see also the point made earlier that due to limited pavement and transport one has to rely on a car in the villages).

Medical facilities
There are only possible proposals to extend the Kingston Avenue Medical Centre. This medical facility is already extremely busy, and an extension at least in proportion to the increase in residents is required to ensure that all village residents have access to essential healthcare services.

Due to proposed additional residents served by the Royal Surrey County Hospital, a major extension would be required.

Schools

The local plan does not address the additional expansion of educational services required to meet the needs of the extra residents. Currently schools and educational services already experience waiting lists. There is one comprehensive school (Raleigh) within the village which is already full. This will need corresponding investment to enable extension to accommodate the significant number of additional residents.

Given the main secondary school within the area, Howard of Effingham, will have a significant volume of additional houses within its wider catchment area (which is not just limited to East and West Horsley), provisions desperately need to be increased to ensure that sufficient education is available for the larger population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14525  Respondent: 11047681 / Robert Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Development within the green belt

The stringent national criteria for exceptional circumstances for removing greenbelt classification has not been met.

The area is uniquely placed to act as a barrier from the urban sprawl of London, and adjustments to the greenbelt boundaries will result in an additional housing load. This will erode the current green area between the major towns of Woking, Cobham, Leatherhead, and Guildford. I do not believe the reason for removal of green belt status is justified.

This area of rural Surrey attracts visitors to the region, such as walkers and cyclists from outside the county and its importance extends beyond that of the local residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/14531  **Respondent:** 11047681 / Robert Stewart  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Relative size of proposed developments**

The level of development proposed within East and West Horsley at 35% is vastly out of proportion to that of the size of developments within the rest of the county. The village cannot accommodate that level of development without major investment in infrastructure and other local provisions.

**Village character**

The proposed high-density housing sites within the villages are totally out of character with the current low density settlement, and will have a big impact on village life. It may not be the most picturesque of villages within the area, but there are historic buildings within it, and the village has a strong community. New housing developments should maintain the sensitivity of this.

**Summary**

I welcome the construction of new houses in the area in a sustainable fashion, in line with the sensitivities of the area, and within the capabilities of the village infrastructure and services. As outlined above, the current proposals are inadequate and do not meet the requirements outlined by government. I therefore hope that you will reject the proposals in their current state.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/2404  **Respondent:** 11047681 / Robert Stewart  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Whilst I welcome the removal of site A36 and A41, the amendments have not addressed the failings in the local plan on infrastructure (that the level of development is so extensive the area cannot accommodate the additional housing without major investment in infrastructure and other local provisions), development within the green belt and other concerns as stated in my letter dated 17 July 2016, for the following sites:

**Former Wisley Airfield (site A35)**

**Bell & Colvill (site A37)**

**Manor Farm Site (site A38)**

**Ockham Road North (site A39)**

**Ockham Road North (site A40)**

**Garlick’s Arch (site A43)**

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/3868  **Respondent:** 11047809 / Jeremy Frost  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to the plan not taking into account the current infrastructure within the Horsleys. Guildford Borough Council’s Infrastructure Schedule (Appendix C) gives no details. It does not address any of the important local issues which we currently deal with and it does not put forward any suggestions for improving or expanding the local services. The Horsley’s infrastructure already struggles a lot of the time, let alone with any substantial increase in its population.

- **Doctors:** Horsley Medical Centre is already unable to provide adequate appointments for its current patients, with many appointments having to be made weeks in advance to see a particular doctor. The situation will only worsen if there is a significant increase in registrations.

- **Horsley Train station:** The car park already gets very full with commuters, but with an increase in commuters this would put a lot of pressure on the parking situation.

- **Flood Risk:** The plan does not take into account our flood risk. There are many roads and fields in the Horsleys that flood regularly with heavy rain. Only 2 years ago did we see several main roads, such as Ockham Road North and in particular East Lane, which remained flooded for a couple of months due to the continued rainfall. As well as some of the proposed sites being on land that already floods, by taking away fields which currently help to drain surface water, this is only going to make the situation dramatically worse. With the climate change we are currently experiencing, we are seeing more extreme weather events and unfortunately over the longer term, I can only see the flooding situation getting worse. In addition Thames Water has already informed Guildford Borough that our current wastewater system in the Horsleys, which already struggles to cope, will not be able to support any increased demand which would without doubt come with the proposed housing developments.
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<th>Comment ID: PSLPA16/3869</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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As a local resident in West Horsley, with 1 child in The Raleigh and myself working locally, we are fully aware of how the Horsleys can struggle to cope with its current residents, let alone if the population were to increase. I have tried to make my points objective and hope you will address them when considering the proposed plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to The Wisley Airfield Development still being in The Guildford Plan, as this was unanimously refused in 2016 by the planning committee and hence should not have been included. The impact this would have on the Horsleys would be immense.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Wisley airfield site being put back into the plan, despite it being turned down by the planning committee recently. The detrimental effects it would have on the surrounding villages, such as the Horsleys would be huge.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16208  Respondent: 11047809 / Jeremy Frost  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Station Parade in East Horsley: The plan designates this as a “Rural District Centre”, partly because of Budgens which is described as a large supermarket. Anyone living in East and West Horsley knows that it is a very small supermarket and hence due to its size, is able to open on a Sunday. Parking is already quite difficult and if the potential number of shoppers were to increase, then particularly the elderly and less able residents would struggle to reach the shops when they needed to. This is a total misinterpretation of the local facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16207  Respondent: 11047809 / Jeremy Frost  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The plan in my opinion fails to deal with the following infrastructure issues:

- **Schools**: The Raleigh school is the main state primary in the area and is already oversubscribed for every year. Currently this means that many children have to travel significantly further to access a state primary school, despite living in walking distance to The Raleigh School. It was only a few years ago that the school had to build
additional classrooms to meet the demand for places. The school is already fully enclosed by houses on all sides, so further development is not an option. The Howard of Effingham Secondary School is also at full capacity.

- **Roads and pavements:** With the proposed number of new houses to be built, this makes for a huge increase in traffic, particularly as most households have 2 cars. All roads running through East and West Horsley already experience high levels of traffic, which results in speeding being a safety concern through the villages. Major congestion is also already seen around the three schools (Raleigh, Glenesk and Cranmore), at both drop off and pick up times. The condition of the roads is currently unacceptable, with major potholes and defects in all of the village’s roads. More cars are only going to exaggerate the situation. The pavements are unfortunately in poor condition too, making walking for the elderly and people with children and buggies quite dangerous at times. The roads around the village are already narrow, so widening is just not an option. Therefore any major population increase is just not compatible with the current roads and pavements.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/16258  **Respondent:** 11047809 / Jeremy Frost  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I would like to take the opportunity to give my considered opinion on the Local Plan Strategy Sites Issues and Options document and in particular how this would affect the Horsleys. Although I understand the need for a major increase in housing stock (I have two daughters who are likely to struggle in coming years to buy a home of their own, without an increase in affordable housing in the area), I believe that the plan, is flawed in many ways.

I object that it doesn’t take into account the current infrastructure within the two villages, which in no way could support a significant increase in population. It is my opinion that the plan does not address the following infrastructure issues:

- There is only one state primary school. The Raleigh school, which serves both East and West Horsley, is over subscribed to every year and has already had to extend the existing building on several occasions to meet demand for places.
- The Horsley Medical Centre which serves both villages and their surrounding areas can not currently meet demand with village residents having difficulty in getting appointments.
- Parking facilities are extremely limited in the shopping areas of both East and West Horsley. A significant increase in population would make it difficult, if not impossible, for many of the older and less mobile inhabitants to reach the shops. It is also wrong and misleading to call the East Horsley parade of shops a ‘District centre’.
- The additional traffic generated by the new homes would be considerable, with most households having at least two cars. Congestion is already seen around the schools (Raleigh, Glenesk and Cranmore) during drop-off and pick-up times and around the shops. The current condition of the roads is far from desirable and although I understand council budgets are under extreme pressure, significant increases in traffic is not going to help this situation.
- Like the roads, the village pavements are in disrepair and can be difficult (and dangerous at night) to use with pushchairs. Although the pavements could be repaired, there is no room for them to be widened in order to handle the increased footfall.
During periods of heavy rain, many of the roads within the village become flooded. This problem would be a lot worse if there weren’t adjacent fields for the water to run-off onto. Building on a number of these fields could potentially lead to significant flooding within the village. The existing waste water system struggles even now and Thames Water has already said that it would not be able to cope with any additional demand.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Respondent: 11047809 / Jeremy Frost</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td>I object to the removal of the Horsleys from the Green belt. In order for an area to be taken out of the Greenbelt, it requires ‘exceptional circumstances’ and I don’t believe that Guildford has set out a solid case for this.</td>
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<tr>
<td>I object to the Plan taking the Horsleys out of the Greenbelt. The plan fails to demonstrate the ‘exceptional circumstances’ that are required for this action to take place.</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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I object to the plan’s housing figure put forward of 13,860 houses. In addition to questions already being raised about the accuracy of the model used to obtain this figure, it is also pre Brexit, so most likely the figures will need to be reduced significantly. A lesser, more appropriate housing target, could then be accommodated using mainly Brownfield sites.

I object to the proposed disproportionate allocation of new houses across the borough. When looking at the existing numbers of houses in the Horsleys, we would be having an increase of 35%, compared to eg. urban Guildford which is only allocated 11%. Such a high density housing development would completely change the character of our small villages forever.

I object to Guildford Borough Council not looking closely enough for suitable Brownfield sites in urban Guildford which should be targeted first for development. These sites would mean the Green Belt is not destroyed and on a more practical level, they already have the infrastructure in place eg sustainable transport options, to cope with the increased numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1803  Respondent: 11047809 / Jeremy Frost  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

To conclude, I hope you can see that my objections to the current Local Plan are considered rather than emotive and that you will address the points I have raised when amending the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3133  Respondent: 11047873 / Mary Waldner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **APPENDIX C**

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. **SITES - POLICIES A1 TO A57**

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as well as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as well as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this
has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3135  Respondent: 11047873 / Mary Waldner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6260  Respondent: 11047873 / Mary Waldner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY A25 - Gosden Hill Farm

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).
The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPS16/6263  Respondent: 11047873 / Mary Waldner  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY A43 AND A43a – Garlick’s Arch

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.
Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<tr>
<th><strong>Comment ID:</strong> PSLPP16/12995</th>
<th><strong>Respondent:</strong> 11047873 / Mary Waldner</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
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</table>

1. **POLICY D3**

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
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<th><strong>Comment ID:</strong> PSLPP16/12998</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy D4</td>
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**1. POLICY D4**

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/12957  **Respondent:** 11047873 / Mary Waldner  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**1. POLICY E1**

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12964  Respondent: 11047873 / Mary Waldner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12968  Respondent: 11047873 / Mary Waldner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **POLICY E5**

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/13005  **Respondent:** 11047873 / Mary Waldner  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire):**

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1. **POLICY E6**

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. **POLICY H1**

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY H2**

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/13000  **Respondent:** 11047873 / Mary Waldner  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY H3**

1. I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being “closely related”. In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12975  Respondent: 11047873 / Mary Waldner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY I1

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12976  Respondent: 11047873 / Mary Waldner  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY I1

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and
with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Comment ID: PSLPP16/12979

**Respondent:** 11047873 / Mary Waldner  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. **POLICY ID3**

I OBJECT to poor air quality concerns (Policy ID3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: PSLPP16/12946

**Respondent:** 11047873 / Mary Waldner  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. **POLICY P2**

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional
circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.
Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<thead>
<tr>
<th>Comment ID: PSLP16/12952</th>
<th>Respondent: 11047873 / Mary Waldner</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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1. POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLP16/12935</th>
<th>Respondent: 11047873 / Mary Waldner</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
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I object in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

In particular, as a resident of West Clandon, living on The Street, I am concerned that the infrastructure is not sufficient, in particular the road through West Clandon will not support the additional traffic that development will bring. The road is already dangerous as the number of accidents attest.

I object in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/12924 **Respondent:** 11047873 / Mary Waldner **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

In particular, as a resident of West Clandon, living on The Street, I am concerned that the infrastructure is not sufficient, in particular the road through West Clandon will not support the additional traffic that development will bring. The road is already dangerous as the number of accidents attest.

I object in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/12941 **Respondent:** 11047873 / Mary Waldner **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these
adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire):** (No)

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire):** (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.
The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1540  Respondent: 11047873 / Mary Waldner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.
1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound.
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018.
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars.
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1542  Respondent: 11047873 / Mary Waldner  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/6519  **Respondent:** 11047969 / Richard Poppe  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

If it were to be shown that in fact the destruction of the Horsley villages, along with Ockham and their local countryside can be justified legally by simply re-writing the laws governing the Green Belt, then I would further object to the plans on the grounds of a severe lack of infrastructure, either currently available or planned.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/6518  **Respondent:** 11047969 / Richard Poppe  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am shocked to read about the gerrymandering with established boundaries in, what appears to be, an attempt to make the plans work where they are unworkable under existing and long established village boundaries. It is my understanding that any change in Green Belt boundaries should demonstrate exceptional circumstances. I see no exceptional circumstances to justify the proposed arbitrary changes to the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPP16/6522 | Respondent: | 11047969 / Richard Poppe | Agent: |
|-------------|---------------|-------------|--------------------------|
| **Document:** | Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) | () |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
| There are obvious and real reasons why the plan to ‘adjust’ the village boundaries and cancel large areas of Green Belt to accommodate a 35% increase in local households does not work. In addition the loss of recreational amenities, both for local people and the considerable number who travel, particularly from London would be disastrous. There appears to be a determination to extend the boundaries of the built up area of London through the Horsleys, past Guildford and beyond. Our Green Belt is precious. It is what protects London from urban sprawl; it preserves air quality; it prevents flooding; it is the city’s playground. It is for us to conserve and protect it. I understand that there are five legal purposes for Green Belt as I am certain you are aware, and the area around East and West Horsley is particularly critical in meeting all of these criterial: |
| • To check the unrestricted sprawl of large built up areas  
• To prevent neighbouring towns merging into one another  
• To assist in safeguarding the countryside from encroachment  
• To preserve the setting and special character of historic towns  
• To assist in urban regeneration by encouraging the recycling of derelict and other urban land. |
| The concept of limiting urban sprawl, and the requirements for the establishment and maintenance of the Green Belt have apparently been disregarded or completely ignored in the new Guildford Local Plan. |
| May I urge you urgent to reconsider this objectionable and unworkable plan that will result in the loss of the villages and country in which we live. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

| Comment ID: | PSLPP16/6515 | Respondent: | 11047969 / Richard Poppe | Agent: |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a resident of West Horsley, I would like to register my objections to the Guildford Local Plan, and specifically the plans as they apply to the villages of East and West Horsley; including the development of some 5-600 new houses in the Horsleys, and a further 2000 within two miles of the villages.

I have read the various documents explaining the details of the Local Plan, and it is clear that you are likely to be overwhelmed with letters of objection. It is very apparent that whole parts of the plans have either not been thought through, and indeed significant areas appear not to have been addressed in any way. It seems that there has been a very superficial attempt to create a solution that is clearly impractical, unworkable, and objectionable on various counts which I am sure will be clearly set out in a great many letters.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6520  Respondent: 11047969 / Richard Poppe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I drive to my place of work each day from West Horsley. My route takes in the A3 and M25. I am acutely aware that the local road structure is completely unsuitable for today’s level of traffic. The queues every day on the A3, both north and south, on the M25 access roads, in both directions, and on the M25 itself, are totally unacceptable. It is a vital imperative that the Authorities take immediate and major action to relieve the congestion that is currently choking our roads. This is the situation today, and before any consideration of the significant increase in commuter vehicles as a result of these ‘plans’. I believe that there are further very large developments planned for nearby areas such as Burnt Common and Burpham. I see considerable unemployment and urban degeneration resulting simply from the inability to travel to any place of work.

This is, of course only one area where the infrastructure is totally overwhelmed. Many people, more qualified than me will explain the equally, or probably even more important, impossible situation with regards to schools, medical facilities, shops and public transport and other aspects of local infrastructure. None of these appear to have been adequately addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1469  Respondent: 11047969 / Richard Poppe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1
As far as I can see the changes, so far as they affect West Horsley, while to be welcomed, are very minor and do not materially change the situation regarding the sheer number of houses to be built in the village, and also in the surrounding villages. The very obvious consideration of the complete overload of all the infrastructure in this area remains a clear and total block to the plans. It is quite clear to everyone I discuss this with that shops, schools, medical facilities and all the other amenities which manage to cope with the current population density will become swamped to the detriment of everyone.

[One or more sections of this comment have been removed because they did not relate to a change to the plan.]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3963  Respondent: 11048001 / Robin Dorran  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

The removal of the villages of Send, Send Marsh and Ripley from the green belt which has been proposed by the Council without taking on board the objections and concerns voiced by the locals.

It is also very misleading by using the term 'insetting' for most of the villages as many of the public do not appreciate that this is removing the villages from the valuable green belt which was put in place to protect the sprawling of development.

Although at this stage of the plan the council have only highlighted a few development sites for each village they will be very aware that by taking these important villages out of the green belt there will be a raft of planning applications submitted which will then have a presumption in favour to approve (as the villages are no longer protected by the green belt)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7393  Respondent: 11048001 / Robin Dorran  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2) I object to the inclusion of the land (A43) at Garlicks Arch, Send Marsh/Burnt Common as it forms an important green buffer between the A3 and Burnt Common with a large area of Ancient woodland together with wildlife and IT IS GREENBELT. The Council have numerous brown field sites and land which would be better suited for this kind of development. The land is liable to flooding and there has been no FRA (flood risk assessment) carried out. The inclusion of this site would overburden the villages of Send and Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/7394</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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3) I object to (A43a) the on/off ramps for the A3 at Burnt Common as it would result in an enormous increase in traffic through Send and the surrounding villages which do not have the infrastructure to cope with this volume of traffic. Clearly this link would not be required if Garlicks Arch is not developed and the council could spend the money on more worthwhile road improvements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/2245</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
I strongly object to policy 4.3.13 which removes a number of villages from the green belt for the following reasons:

Whereas only certain sites have been identified within these villages at this stage of the local plan it will open the floodgates to future high density infilling within the villages which will put pressure on the infrastructure and roads and more importantly destroy historic English villages forever.

There has been little consultation from the council with the public many of whom do not understand the implications of this document.

The Localism Act has been ignored

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to (policy S2) as the plan is unbalanced with too much proposed in the north east of the borough with large developments in Ripley/Send (A43) Clandon (A25) and Wisley (A35) and will result in the urbanization of these important villages which do not have the infrastructure to cope with such an increase.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I want to object to the Draft Local Plan (refs A36, A39, 90, 353, 2177, A37, A38, A40, A41, 2292, 350, 1219, 1275, A35,) affecting the Horsleys on the following grounds:

- **Traffic and Parking** - our streets are already congested. It is very difficult to park at the Parades on Ockham Road and due to the sheer volume of cars, it is often difficult to see people crossing the road with the consequential accident risk this has. Adding to this pressure and risk with more households which bring at least 2 cars per household on average is simply non-sensical given the potential accident dangers that could follow;

- **Pollution** - the large increase in the volume of traffic will cause an increase in pollution levels which is already a concern in our area.

- **Flooding** - the area already suffers from flooding and building in this area will only exacerbate the situation. The soil and drains already cannot cope.

- **Schools** - local schools are already at capacity. Where will the children of incoming families go to school? Even if the schools were to be expanded, or new schools built, the standard of education for which the area is known will suffer adversely which will ultimately impact the desirability of the area for families. Hence, the development will not lead to families residing the area if the schools are not up to scratch, and therefore the development will not achieve what it set out to.

- **Medical facilities** - similar point to schools.

- **Transport** - road and rail links are already busy, if not congested. Our transport infrastructure will be under enormous strain by increasing the numbers of users with the result that there will be failures, poor service, misery for those that travel and ultimately, make this area unattactive for people to move to. Hence, the development will not achieve what it set out to do.

- **Green belt land** - developing on our countryside will slowly erode the beauty of Britain. There is a reason why Britain is so attractive to live in and this is in part due to the countryside we have here. To build in our countryside will only destroy this beauty and ultimately, make our country and in particular, this part of the country, unattractive.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5. I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.

   b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.

   c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

   d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

   e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No
development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

1. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heath's Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

2. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

3. I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

4. I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPP16/671</th>
<th>Respondent:</th>
<th>11048289 / Susanna Harrington</th>
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<td>Document:</td>
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"Affordable housing" is a misnomer in any case. Any "affordable" housing in Surrey will only be affordable for the first sale and then the price will immediately shoot up to being unaffordable on the second and subsequent sales.

Affordable housing is needed mainly in town centres and in particular on Guildford brownfield sites and brownfield sites in other Surrey towns.

Affordable housing is needed for people like carers, nurses, firemen and community workers who are suited to living near hospitals and with bus and train services already established. Guildford does not need its brownfield sites for business and retail development. The very nature of shopping is changing as younger generations will do more and more on line. Guildford abounds with retail outlets as no doubt do other towns in Surrey. The Council must provide housing in towns where it is most needed and some sort of control over pricing must be thought through.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/673  Respondent: 11048289 / Susanna Harrington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Disproportionate housing development would cause chaos to already oversubscribed schools and railway station car parks. There is already a problem with pedestrian and cyclist safety on crowded roads with no pavements or paths. The cycle lanes are just a joke, far too narrow and peter out just as they are most needed at junctions and roundabouts.

There is a lack of local buses and the infrastructure is simply not there.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/672  Respondent: 11048289 / Susanna Harrington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The number of cars belonging to the owners of the proposed development sites will add to the traffic congestion at an unacceptable level. The small, narrow lanes surrounding these developments are not capable of supporting any more traffic than at present without causing complete jams and grid locks, and will be intolerable and dangerous when there are roadworks or traffic incidents and crashes on the main roads, such as the A3 and M25. The building of the M25 brought about a large increase in traffic and more would be unsustainable. Already huge lorries using satellite navigation are jamming small country lanes and causing damage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/674  Respondent: 11048289 / Susanna Harrington  Agent:
**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Surrey is a pretty county with important sites of nature and woodland. These must be protected at all costs for future generations ensuring their well being and sanity. It is being understood more and more that being outside, surrounded by nature, is beneficial to everybody's health and mental well being and that in its turn has a direct impact on doctors' surgeries and hospital queues.

I have a very low opinion of Guildford Borough Council's past performance and its complete inability to maintain the safety of the countryside, to provide properly for the inhabitants. Let's hope some common sense will now prevail and there is a good rethink of the unacceptable GBC Local Plan that has been put before us. I object to it in the strongest terms possible.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID: PSLPP16/670  Respondent: 11048289 / Susanna Harrington  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The protection of the Green Belt, the Lungs of London, has been of paramount importance to generations and should be upheld at all costs.

It is known that pollution from traffic is detrimental to the brains of growing children and no good for the health of anyone. Development on the scale recommended is tantamount to murder. In particular, the building of the A3 Ripley Bypass some 40 years ago was to avoid the blockage and unreasonable amount of traffic going through Ripley. What does the Council think will happen now with so much proposed development to the traffic on our local roads? It is a 'no brainer' except for the very stupid. We will be back to square one, just as we were when a Guildford bypass had to be built to avoid the bypass that was already there.

Parking in Ripley is impossible for residents. As an ageing resident of Ripley I have to walk a mile to get to the shops and am unable to carry anything heavy home apart from the newspaper and perhaps some milk and the odd vegetable. How much longer I shall be able to continue to do this is in the lap of the gods. We have been promised proper parking in Ripley ever since I moved here in 1975 and almost as soon as it was provided it was taken away for development and the smaller car park there now provides parking for the "affordable housing" development recently built on it.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
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<td>I appreciate that there should be housing but not to the extent proposed. Our village infrastructure can not cope with the volume suggested.</td>
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<td>137 houses on Manor farm of 16% density. Ridiculous.</td>
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<td>Same for another large site on Waterloo farm.</td>
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<td>Some appreciation for the dramatic impact on schools, roads resources needs thinking about and reevaluating.</td>
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<tr>
<td>I object to this plan</td>
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<td>The greenbelt is so unique as a buffer from congestion, pollution and wildlife. To completely disregard the greenbelt is a complete failing by the council.</td>
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I particularly object to the density sited in the local plan and the volume of housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/239  Respondent: 11048353 / Lynda Hill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am objecting to the local plan in Surrey and in particular to West Horsley.

I am amazed that very little consideration has been given by the council to previous objections. Nothing seems to have altered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3717  Respondent: 11048417 / Dilek Bozan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to building 400 houses and 7000 square metres of industrial space at Garlick’s Arch – development at existing brownfield site areas rather than over ancient woodland on Green Belt land would be far less destructive and would avoid additional risk of flooding in an area where water drainage and flooding are already issues. Living adjacent and below this planned development and knowing that we are already in a flood risk area I feel this proposed development would cause future problems. Additionally the natural buffer offered by this strip of woodland between the housing in Send Marsh and the ever increasing traffic of the A3 is extremely important for both air quality and noise reduction.

The development of this area, necessitating the loss of an extremely valuable relief of green belt woodland, additional flooding risk and increased traffic local to an already dangerous junction, against, utilisation of existing brownfield sites does not seem necessary or beneficial.

I object to the proposed removal of Green Belt Protection for Send - the Green belt status should be left in place as per the National Planning Policy framework to provide permanent protection against over development and the risk of conurbation and transformation of villages into sprawling areas of mass population.
I object to the building of 45 houses at Clockbarn Nursery – Tannery lane is not a road which can safely accommodate an increase in traffic, further development along this lane will increase existing over-use.

I object to the new development of 40 houses & 2 travellers’ pitches at Send Hill – unsuitable local access and the use of countryside for development purposes will negatively impact the existing area.

I object to the new A3 interchange at Burnt Common – increased traffic caused by the interchange will cause over congestion and increased pollution in the surrounding villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPA16/3885</th>
<th>Respondent: 11048481 / Patrick Oven</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposed Local Plan, both generally and specifically as it affects the Send Ripley and Clandon areas of the Borough is fundamentally flawed, appears to be developer, rather than need driven, and has grossly over-estimated the housing and business needs of the borough, disregarded the principle of the Green Belt, and utterly ignored the capacity of the available infrastructure to cope with further development. The housing need for Guildford Borough appears to have been grossly exaggerated, a suspicion not allayed by the refusal of the Council to disclose the basis on which it reached its SHMA. The Council has also not fully utilised "brownfield" sites before considering the greenbelt ones, another indication of this plan being largely developer led, as greenbelt is cheaper and easier to build on. None of the areas now proposed for development in so far as the Send area is concerned in the plan being submitted to the Inspector were in either the original draft plan nor its amended counterpart.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPA16/2484</th>
<th>Respondent: 11048481 / Patrick Oven</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
In objecting to the removal of Send and neighbouring villages from the Green Belt, policy P2, proposal to build 400 houses and 7000 sq metres of warehousing at Garlick's Arch, policy A43, and building of 40 homes and 2 travellers pitches at Send Hill, policy A44, I would add the following:

Send has continued to grow over the past few years, and will continue to do so, despite being in the Green Belt. That development has been sensible and sustainable. The old Sex and Sons Foundry has gone and been replaced by about 12 houses in Walnut Tree Place and some additional houses and flats on Send Road by the entrance. Skene Close, comprising 6 detached houses, replaced the former 2 houses that had formerly been on the site last year. Vision Engineering, having shown there were exceptional circumstances, have been allowed to develop a new single storey factory on their Green Belt land between Send Road and the Wey Navigation. In completion of the new factory, the old one is to be demolished and over 40 homes are to be built on the site. Send has thus continued to grow, but in a controlled, sensible and sustainable way. To remove it, and the neighbouring villages. from the Green Belt is unnecessary, and defeats the whole object of the Green Belt and the intention to preserve it in perpetuity. Ripley too, has continued to grow whilst remaining in the Green Belt. Numerous houses have been built on brownfield sites behind the High Street on both sides and in Rose Lane.

I have no objections to such brownfield development. Hence, I would raise no objection to the proposal to build 45 houses at site A42, Clockbarn Nursery, which appeared in the amended Local Plan, but seems inexplicably to have been omitted from the draft plan before you. Why is Guildford so determined to build on green field sites, and remove area from the Green Belt, when there are clearly brownfield sites like Clockbarn available? Interestingly, the amount of houses proposed for Send Hill, policy A44, is 40. Just less than that which was proposed for the abandoned, brownfield Clockbarn site! This illustrates just how little thought has gone into this plan. I cannot comment on other areas of the Borough, but one suspects similar is occurring elsewhere and that your attention will be drawn to clearly unnecessary development, or unnecessary removal of areas from the Green Belt, by those with the relevant local knowledge.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7260  Respondent: 11048481 / Patrick Oven  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed developments at Gosden Hill, site A25, and Blackwall Farm, site A26. Again, these are predicated on the basis of a "housing need" that has not been satisfactorily proved to exist. Again, the infrastructure in the area is utterly inadequate to cope with the additional need for roads, sewers, medical facilities and schools. My principal objection though is that these, along with the proposed developments at Wisley airfield and Garlick's Arch, would lead to a continuous solid development from the A3 junction with the M25 through Ripley, Send and Burpham to Guildford. Along with the development that is already going to occur in Send, through the building of housing on the old Vision Engineering site when their existing factory is demolished after the new one is completed (permission already granted), we have potentially a nightmare scenario where Guildford is developed to the M25 along the A3, A247 and B2215 corridor. 70% of the identified "housing need" for the Borough in this utterly flawed plan is proposed to be catered for in this area. It is utterly disproportionate, and the villages to the north-east of Guildford are to be destroyed to save Guildford itself. The planners should be identifying brownfield sites within Guildford to build, rather than cravenly caving in to the pressure from developers who want to harvest the low hanging fruit of building on Green Belt land. The legislation was intended in 1947 to avoid precisely this sort of thing taking place.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7259  Respondent: 11048481 / Patrick Oven  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed development of 2000+ houses and associated infrastructure, essentially a new small town, at Wisley Airfield, site A35. This is predominantly farmland, and the access would be onto an already gridlocked A3. Even the provision of a proposed new junction on the A3 at Garlick's Arch, if built (see above), being some distance south of the proposed development would be unlikely to alleviate the problem, however much the Council hopes it would. It seems clear the Council is running scared of the developers here. They are a nebulous company based in the Cayman Islands. They will however have the money to fight the refused planning permission. The Council clearly wants a reason to grant it. The problem again however, is that as indicated before, there is no clearly demonstrated need for homes for 5000 people at this location. Ockham, the nearest village, or more appropriately hamlet, is very pretty, indeed unspoilt. It would be utterly overwhelmed by this monster. Whilst this was the Vickers development airfield, the only parts of this that could be said to be industrial and are the runway and the hangars. The hangars are long gone, and the great majority of this site is productive, high quality farmland. Development here is utterly inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7256  Respondent: 11048481 / Patrick Oven  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not object to the proposed building on site A42, Clockbarn Nursery, behind Send Road and Tannery Lane, on a derelict site, provided adequate access and exit provided by improving the junction between the two roads. I will detail my specific objections below.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the proposed development at Garlick's Arch, site A43. It follows from what I have said above that there can be no justification, on the grounds of exceptional circumstances, to remove Garlick's Arch, from the Green Belt. I further object to the proposal to build at Garlick's Arch, 400 houses, 7000 sq m of warehousing and a four way junction with the A3. This proposal was not included in the original 2014 draft Local Plan nor in the revised one introduced earlier this year. So if it is so essential, why has it only been introduced as recently as 11th May this year, tacked onto the end of the agenda at a meeting of the Council Executive? This stinks of a developer led proposal, a conclusion that is justified by the owner of the land offering it to the Council free provided he is allowed to build 400 houses. If the Council had thought that development on this site was appropriate, why had they not included it in either of their earlier proposed plans? They knew the land was there - it did not suddenly appear like an Icelandic volcanic island! The first time this was even publicly mooted was 11th May. That allowed less than 14 days to the full Council meeting on 24th May which was intended to adopt the plan and put it to the Inspector. It is manifestly obvious that this proposal must have been in the offing for some considerable time prior to 11th May. The conclusion is clear and inevitable: the Council knew how controversial this proposal was going to be and sought to introduce it in as low key a way as possible allowing virtually no time for residents to object. it was a cynical and underhand attempt to subvert the democratic process and to stifle debate, to ensure that the proposal reached the Inspector rather than being fully considered at a full Council before its inclusion in the proposed plan. The intention clearly was to have a 3 line whip on the members of the overwhelming majority Conservative Group to nod it through - which is precisely what happened. Proper public consultation did not happen, [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature.]

There is no clear evidence that there is any need for the proposed 13,860 houses in this plan, let alone that 400 of them should be at Garlick's Arch. The almost 14,000 figure of "needed" houses also fails to take account of planning constraints. The Council has refused to disclose how it has reached its SHMA, and there has to be strong suspicion that it has placed excessive weight on the number of students in the Borough, who are not permanent residents, disregarded the number of empty homes in the area, and over-estimated the effects of immigration - which, though they could not have known this at the time the plan was prepared, may now, since "Brexit", be lower even than originally anticipated as indicated at 1) above.

There is no demonstrated need for 7000sq m of warehousing at this location. The Employment Needs Land Allocation of 2015 suggests there should be an 80% reduction in employment floor space. This warehousing was originally intended to go onto the existing Burnt Common site a few hundred yards to the south-west, which at least had the benefit of being an existing industrial site. Garlick's Arch, both as a potential industrial site and for housing, is inappropriate. It is not only Green Belt land, but much of it is Ancient woodland, and as such even more deserving of preservation. The belt of woodland provides a visible and audible barrier for residents on Portsmouth Road, Burnt Common, from the A3. Parts of the site are prone to flooding - and indeed were under water in January this year. If there really is a need for such warehousing, it should be at Slyfield industrial estate off the A320 between Guildford and Woking. That site was originally to be extended, is low quality land with few houses in the vicinity and could have access improved by the provision of a new access road and junction in the Clay Lane area to and from the A3. It simply makes no sense to create a new industrial site, let alone on a green belt site with Ancient Woodland on it, when there is space available at an existing industrial location. Astonishingly, in writing to those acting for the proposed developers at Slyfield, that land was described by the Council as "sitting in a high sensitivity parcel", not to be developed "unless there is strong justification for doing so". Garlick's Arch however, in the same correspondence provided to me, was described as "medium sensitivity". North Slyfield is assessed as "contributing more towards the purposes of the Green Belt" than Garlick's Arch. This is surely astonishing that an area that is both Greenbelt and Ancient Woodland should be so lowly regarded. it seems to me that the Council is deliberately overstating the sensitivity of the land adjacent to Slyfield - poor quality boggy marsh, and understating that of Garlick's Arch because it is determined to build at the latter and not further develop Slyfield. This conclusion is strengthened by the next thing the Council said to those acting for the Slyfield developers... "it" (Garlick's Arch)... "has in addition to the benefits of meeting our industrial need, significant further benefits in that it facilitates a new on/off slip with..."
the A3. We also consider that the site is more accessible to the strategic road network compared to the North Slyfield site which will assist HGV access to and from the site with less impact on the local road network and residents”.

The Council's conclusion takes no regard of the effect on people living in Burnt Common, Send Marsh or Send itself, who would have their already overcrowded roads laden with even more HGVs. The proposed junction is the real clincher. This is the real reason the Council wishes to develop Garlick's Arch - to provide a junction that will assist the proposed developments further afield at Wisley and Gosden's Farm. They have not been honest about this, but Send, Send Marsh and Burnt Common are to be sacrificed on the altar of developer-led building to allow the Council to reverse its decision to refuse the Wisley airfield proposal. It clearly fears "planning by appeal " given the applicants are a wealthy Cayman Islands based company who can afford to fight the refusal. The junction is not needed at Garlick's Arch and the effect on the area of this proposal is out of all proportion to its supposed advantage. The infrastructure in the area, roads, sewers, medical facilities and schools, are already at full capacity. They simply could not cope with the additional burden imposed by the Garlick's Arch proposal. The proposed junction would not merely service the immediate area. Traffic using the M25 clockwise and intending to go to Woking, instead of leaving at junction 11 or 12, would leave at 10, thus avoiding some of the delays that build up from that junction, travel the short distance, 2 miles, down the A3 to the new junction then leave there and travel along Send Road, already at full capacity morning and evening, adding to pollution and noise.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7258  Respondent: 11048481 / Patrick Oven  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed development of 40 houses at Send Hill together with a 2 pitch travellers' site. Again, this is Green Belt land, there are no "exceptional circumstances" to justify taking it out nor to allow development within it. It provides a useful and attractive area of open land between Send Hill and Potters Lane, which at this point, runs parallel to it. The land in question has been used as a dump in the distant past, and is littered with vent pipes. It is highly likely to be contaminated, given that its use for dumping predates more recent environmental legislation. Development here would be potentially hazardous to health. The road itself is very narrow, at the Potters Lane end especially so. It cannot take additional traffic, and certainly could not deal with Transit vans or even lorries towing large caravans. It is an utterly inappropriate area for such a site. I can only assume that whoever proposed this ludicrous idea has not visited the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16257  Respondent: 11048481 / Patrick Oven  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the "insetting", i.e. removal, of the villages of Send, Ripley and the Clandons from the Green Belt. There is no demonstrated need let alone "exceptional circumstances" for such action and the proposed massive development in these areas. The former Secretary of State, Eric Pickles, emphasised last year that Councils did not need to achieve Government building targets at the expense of the Green Belt. Both the outgoing Prime Minister and Chancellor, David Cameron and George Osborne, reitered this earlier this year. There is no reason to assume that government policy has changed in the light of events over the past week, and indeed "Brexit" may well lead to a reduction of immigration, depending on the terms of withdrawal from the EU that are negotiated in due course. The Green Belt was to remain sacrosanct as a buffer between urban area except for where exceptional circumstances exist. It is abundantly clear from the proposals in this ill-conceived plan that no such circumstances exist as regards the proposed developments on green field sites in the existing Green Belt.

Send in particular, I concede is not a pretty village, at least as far as the central section of it's main street is concerned. Nevertheless the roads off it are predominantly attractive semi-rural and rural lanes, soon running into attractive and largely unspoilt countryside. Send in particular however, has one attribute shared by only one other village, Shalford, in the Guildford Borough Council area: the Wey Navigation runs through it. This provides a beautiful rural corridor through the northern edge of the village, especially from Trigg's Lock south-west of the village to the Tannery Lane Business Park north-east of it. The Green Belt principle has already been breached in this area by the grant of planning permission for the construction of the new Vision Engineering factory adjacent to the Navigation, but it is accepted that exceptional circumstances were shown for the building of the new factory on land owned by the company next to the existing one. That of course is no reason to allow any further development without again demonstrating exceptional circumstances, nor I would argue, to remove this area from the Green Belt. Send, and its neighbours, should remain in the Green Belt to continue the separation of Guildford from Woking and to avoid having what would effectively be one continuous conurbation from the M25 to Woking to the west of the M25, and to Guildford to the south-west. That is what the Green Belt principle was intended to achieve, and which remains its objective, the intention being that the Green Belt should be permanent unless special circumstances are made out. They clearly are not here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/16256 | Respondent: 11048481 / Patrick Oven | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

The housing proposed for Send was initially 435, then on the amended plan, (after a sustained and effective campaign by the Save Send Action Group), 185, now on the latest plan, 485 houses. The proposals have changed each time not only as regards the number of houses to be built, but also their location. This suggests the Council has never had a clear plan - rather it smacks of desperately making policy on the hoof. It does not inspire the confidence of residents in the planning process on something that is going to affect them for decades to come. The proposals as regards the Send, Send Marsh and Burnt Common area are utterly disproportionate - the areas on the edge of the Borough closest to Woking are being asked to bear an entirely inappropriate amount of the development proposed in the Guildford Local Plan. I do not object to all development in the area, so trust I cannot be accused of "Nimbyism".
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3913  Respondent: 11048481 / Patrick Oven  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECTION TO THE REMOVAL OF BROWNFIELD SITES, A4, GUILDFORD TOWN CENTRE AND A34, BROADFIELD BUSINESS PARK, SHALFORD.

I OBJECT to the removal of these site from the Local Plan. The Council claims to adopt a brownfield first policy. Policy A4, the former Guildford telephone exchange, is now proposed to be used for commercial retail rather than as before, housing. This clearly suggests the Council is failing to properly implement government policy to use brownfield sites first, before going for previously undeveloped land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5101  Respondent: 11048481 / Patrick Oven  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECTION TO THE REMOVAL OF BROWNFIELD SITES, A4, GUILDFORD TOWN CENTRE AND A34, BROADFIELD BUSINESS PARK, SHALFORD.

I OBJECT to the removal of these site from the Local Plan. The Council claims to adopt a brownfield first policy. Policy A4, the former Guildford telephone exchange, is now proposed to be used for commercial retail rather than as before, housing. This clearly suggests the Council is failing to properly implement government policy to use brownfield sites first, before going for previously undeveloped land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY A42, CLOCKBARN NURSERY TANNERY LANE.

I OBJECT to the proposed change to policy 42, increasing from 45 to 60 the number of homes proposed for this site because:

1) the number proposed, an increase of 33% on this small site, is way too high for the existing infrastructure of the site to cope with. The turn from Tannery Lane onto the A247, Send Road, is already an extremely difficult one, with very limited visibility in both directions along the main road. At busy times of the day it is virtually impossible to emerge from the junction safely, especially if turning right. The additional vehicles using this junction from this proposed development will further exacerbate the problem. Further proposed development in the Send area under this plan will further increase the problems at this junction.

First, by adding to the traffic on the main A247 from:

a) the proposed development at Garlick's Arch, policy A43, 400 houses as present proposed, but likely to increase in due course,

b) Send Hill, policy A44, 40 houses proposed, and

c) the proposed industrial/warehousing development at Burnt Common, policy A58, a minimum of 7,000 sq m, leading inevitably to an increase in commercial and in particular, HGVs, using Send Road to and from the site.

Second, by additional traffic using the junction from Tannery Lane to that using it at present, from one definite, and one potential, source:-

the definite source - being traffic from the Cartbridge Basin Marina in Tannery Lane which is at present in course of construction,

the potential source - should Send Business Park be inset from the Green Belt as proposed at paragraph 4.3.15 - clearly this would inevitably lead to further development of this small business park in the very narrow part of Tannery Lane, with the additional traffic generated by it also having to use the junction with Send Road, A247, since the only alternative route being towards Newark Lane Ripley, with even narrower lanes to negotiate. The proposals for Send Business Park will form the subject of a separate objection in due course.

2) The sewerage system in Send is already at full capacity according to Affinity Water. Additional housing will exacerbate this problem - unless there is a proposal to increase sewage capacity. None has been made.

This policy, with its lack of any proposal for infrastructure improvements, is in direct contradiction to the words of the Council Leader, Councillor Paul Spooner, in his introduction to the Local Plan:

"We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the Borough. The delivery of sites allocated in the plan is contingent upon the provision of new infrastructure which is a key theme of our local plan".

So where is the infrastructure upgrade? - simple, there is nothing proposed.
3) This proposal utterly disregards the hundreds of objections made last year to the previous proposal at this location, for the lesser figure of 45 homes.

4) Open views from the Wey Navigation, National Trust land, will be removed by the provision of a housing estate between the Navigation and Send Village.

5) Run-off from the additional houses will add to the existing problem of surface water flooding in Send Road and Tannery Lane - see comments at 2) above.

6) It is already proposed to inset Send from the Green Belt - the subject of a further objection - see post. This proposal will further reduce the semi-rural nature of the village, to its detriment.

It should not be assumed that, by objecting to the additional 15 homes proposed at this location, that I am by implication, agreeing to the original proposal for 45 homes at this site. I am merely confining my objections to what I am permitted to object to at this stage of the process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3910  Respondent: 11048481 / Patrick Oven  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A43, GARLICK'S ARCH, PORTSMOUTH ROAD.

I OBJECT to the proposed change to policy A43, 400 homes and 6 travelling showpeople's plots. Whilst the number of homes has not been changed since the last draft of the plan, they are part of this policy proposal, the proposal has been amended, so logically they too can be the subject of objection within this amended proposal.

1) This is undoubtedly the most controversial proposal in the entire proposed Local Plan. It did not feature in the initial, nor even the first amendment, of the Plan. It was introduced in an utterly undemocratic fashion at a meeting of the Council in May 2016, then adjourned to the next meeting in June, at which the majority Conservative group was enjoined to vote for the Plan to be adopted and put forward to the Inspector. It is clear that the proposal was known to be controversial, both as regards its content and the manner in which it had been surreptitiously added to the Plan effectively by the back door clearly to limit the public's right to legitimately object. There is clear collusion between the landowner and the Council. This policy utterly stinks.

2) There is absolutely no demonstrated need for 6 travelling showpeople's plots at this location. Policy A50, Whittles Drive, Normandy, provides all the plots of this nature that are likely to be required within Guildford Borough. There is no evidence to show that these additional ones are needed. Indeed in the Plan there is discussion as to how these plots could be used for housing in the event they are not taken up by showpeople - hardly a ringing endorsement of the "need" for them!

3) Within the limited scope for objections provided by the manner in which this proposal was introduced in 2016, there has been massive response from the residents of Send, Send Marsh and Ripley against this proposal last year. This has been totally ignored by the Council, other than to remove the proposal for 7000 sq. m of warehousing/light industrial from Garlick's Arch and move it to Burnt Common, policy A58, and increase its amount to a minimum of 7000 sq. m. Clearly the
reason for the removal of the industrial use from Garlick's Arch is to allow space for further house building on this site later - facilitated by the proposed insetting of this site from the Green Belt, along with the rest of Send and Ripley.

4) This is at present, Green Belt land. As such "exceptional circumstances" have to be proved to allow development on it. No such evidence has been provided by the Council, who seem intent on simply insetting the site from the Green Belt to avoid having to show reason to permit development on it.

5) Building on this land will lead to the effective joining of Ripley, Send Marsh, Send and West Clandon, thus entirely defeating the principle of the Green Belt.

6) The land comprises a large amount of formal "ancient woodland", predating the accession of Elizabeth I, 1558. As such there is a strong public interest in retaining it as such.

7) The land currently floods regularly, and is a flood zone 2 allocation. Adding tarmac and concrete will significantly exacerbate a clear existing problem.

8) The proposal for 400 homes on one site is a) excessive and b) disproportionate for Send, Ripley, Send Marsh and Burnt Common.

a) Excessive. The infrastructure in the area being utterly insufficient to cope, roads, sewage, schools and doctors' surgery all being inadequate to cope with probably 1200 additional people and 800 vehicles. No proposal is made in the plan to address this, save for the addition of a new 4 way junction on and off the A3 at Burnt Common - but that not being proposed to be built until after the houses have been built. See the observations made at A) 2) above, re Clockbarn Nursery, policy A42, which are equally applicable here.

b) Disproportionate. Send and Ripley, in the north-east corner of Guildford Borough, have 11% of it's population. Yet the Plan proposes 40% of the development for them, the majority of it accounted for by policy A43, Garlick's Arch. Yet Policy A46, land to the south of Normandy and north of Flexford, which proposed 1100 homes, has been removed in its entirety, whilst Gosden Hill Farm Merrow has its number reduced from 2000 to 1700, and near the Hog's Back, Blackwell Farm's proposed homes has been reduced from 1800 to 1500. This merely emphasises how utterly disproportionate the Garlick's Arch proposals are. Many in the Send area believe it has been punished by Guildford Council for its temerity in electing two Guildford Green Belt Councillors in 2015 - a sentiment this proposal does nothing to dispel.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3912  Respondent: 11048481 / Patrick Oven  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A58, LAND AT BURNT COMMON. LONDON ROAD.

I OBJECT to the proposed change to reintroduce industrial/warehousing space, class B1c, B2 and B8 at this location.

1) There is no demonstrated need for warehousing/light industrial space of 7000 square metres here, let alone a MINIMUM development in that figure as is now proposed since this policy was removed from Garlick's Arch, policy A43,
where it was in the last draft of the Plan. The demand for light industrial/warehousing land has reduced, and there is absolutely no need for any such development in the Green Belt. The 2017 Employment Land Need Assessment assessed the need for employment land in the entire borough at 3.9 hectares, yet this site alone would amount to 10 hectares. At Slyfield, Guildford, there is an area of land behind the currently developed light industrial site that was planned for further development of the Slyfield Industrial Estate, and was so included in the original 2014 draft Plan. This is poor quality land between Slyfield and the A3 trunk road. Any need for further warehousing/light industrial land should be met from this land initially. It is clearly wrong to take Green Belt land in Send for such use, and again, there is no demonstrable need to develop in the Green Belt under the "exceptional circumstances" rule. Only about half a mile separates Slyfield from the A3. There is not even a need for the previously mooted "Clay Lane Development". A new junction on the A3 and a short stretch of road into Slyfield from it could alleviate queues at the Stoke junction in Guildford and avoid the need for much of the traffic for Slyfield using that junction and the A320 Woking Road to get to and from the Slyfield Industrial estate.

2) Traffic using the route to and from Burnt Common, especially HGVs, will add to the already over-crowded local roads in the Send and Ripley area. This locality is already regularly grid-locked morning and evening.

3) If this proposal goes ahead it will, along with policy A43, Garlick's Arch, lead to the effective joining of Ripley, Send Marsh, Burnt Common and West Clandon into one conurbation, utterly defeating the purpose of the Green Belt.

4) The Council has shown a lamentable lack of consistency as regards this proposal. It was included in the 2014 draft Plan, at Burnt Common as now, then later removed. In the 2016 draft it was to be at Garlick's Arch, but deleted from it in the current proposed Plan, and has now reverted to site A58, Burnt Common, but this time in an enlarged form. The Council indicates by its actions it really has no idea where this industrial development should take place, or even how large it should be. An indication of the Council's confused thinking as regards this site is provided by its own comments in the 2016 version of the Plan:-

"The site, (A43, Garlick's Arch), affords greater separation between Send Marsh/Burnt Common and the proposed site at Gosden Hill Farm (policy A25), than the Burnt Common Site, (A58) did. A43 (Garlick's Arch), provides the employment floor space needed in the Plan to help meet identified needs"

A year ago, Guildford Borough Council was trumpeting the merits of Garlick's Arch over Burnt Common to such an extent that it had removed Burnt Common from the Plan entirely. Yet a year on, it has returned Burnt Common to the plan. The Council is ignoring its own guidelines on separation as both policy sites A43 and A58 virtually adjoin each other, being separated only by the A247, Clandon Rd.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
GREEN BELT POLICY 2 AT PARAGRAPH 4.3.15 - RE SEND BUSINESS PARK

I OBJECT to the "insetting" i.e. removal, of Send Business Park from the Green Belt. This is a long-established non-conforming user in the Green Belt adjacent to the National Trust owned Wey Navigation. There is no justification for its insetting and indeed the Council makes no attempt to argue that there is any such reason. It therefore follows that no exceptional circumstances exist as required by the National Planning Policy Framework and thus that there is no reason to inset it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the Policy A42 change at Clockbarn in Tannery Lane because:

- The increase to 60 homes in place of 45 homes is 33% more and far too much
- It ignores all the hundreds of previous objections made by local people
- It will worsen access and traffic problems in Tannery Lane and at the A247 junction
- It will make erosion of the Green Belt in our village worse
- It will make surface water flooding, which is already bad, even worse
- It will impact open countryside views from the River Wey Navigation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1630  Respondent: 11048673 / Claire Bell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43 change at Garlick’s Arch because:

- It ignores all the thousands of previous objections made by local people, including myself
- There is no proven demand for Travelling Showpeople plots in this location
- It is beautiful permanent Green Belt and no “exceptional circumstances” exist
- It will cause over-development of our village and the number of homes is excessive
- It is exquisite ancient woodland that existed at the time of Elizabeth I
- It will join up Ripley and Send and defeat the key purpose of Green Belt
- It is subject to frequent flooding and is currently a flood zone 2 allocation
- It is contaminated by lead shot accumulated over fifty years
- And finally, as to my initial point It will generate excessive traffic that will block up further the local roads of Send and Ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1631  Respondent: 11048673 / Claire Bell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Land at Burnt Common, London Road, Policy A58.
Now a new allocation for a minimum of 7,000 sq m of industrial or warehousing
I object to Policy A 58 at Burnt Common because:

- It was deleted from the 2014 draft because of all the objections made previously
- The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land
- There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt
- The impact on small surrounding roads will create traffic gridlock
- It will join up existing villages and defeat the purpose of the Green Belt

I have lived in Send for 13 years and in that time traffic has increased incredibly and I now regularly get stuck coming up Send Barns Lane to Burnt Common and then down to and through Ripley. Getting through Ripley village is hard work with roads that are too narrow already. Local school places are insufficient and getting doctors appointments is getting harder all the time. The amount of expansion these plans would realise is horrendous and I would love for the local councillors to have to live here themselves to see the complete desecration of our beautiful area. We chose to move to a semi rural area, not a town, which is what this village will become. I wrote a long letter of complaint previously, as did many others, and our voices not only have been ignored but the proposals have got even worse subsequently. What are you thinking? PLEASE reconsider.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to building 400 houses and 7000 square metres of industrial space at Garlick’s Arch – using existing brownfield site areas for development rather than an ancient woodland on Green Belt land would seem to be far less destructive and would avoid additional risk of flooding in an area where water drainage and flooding are already issues. Living adjacent and at an elevation just below this planned development and knowing that we are already in a flood risk area I cannot help feel this development would only cause future problems. Additionally the buffer offered by this strip of woodland between the housing in Send Marsh and the ever increasing traffic of the A3 is very important for both air quality and noise reduction.

The development of this area, necessitating the loss of an extremely valuable relief of green belt woodland, additional flooding risk and increased traffic loading local to an already difficult junction, against utilisation of existing brownfield sites does not seem necessary or progressive.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3556  Respondent: 11048769 / Peter Harmer  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the new A3 interchange at Burnt Common – increased traffic burden in the area will cause over congestion and increased pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3555  Respondent: 11048769 / Peter Harmer  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the new development of 40 houses & 2 travellers’ pitches at Send Hill – unsuitable local access and the use of countryside for development purposes will only diminish the existing area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7830  Respondent: 11048769 / Peter Harmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed removal of Green Belt Protection for Send - the Green belt status should be left in place as per the National Planning Policy framework to provide permanent protection against over development and the risk of conurbation and transformation of villages into sprawling areas of mass population

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3862  Respondent: 11049057 / Simon Boyden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3837</th>
<th>Respondent: 11049185 / Alan Holden</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope and there are already problems with GP access and school places.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3836</th>
<th>Respondent: 11049185 / Alan Holden</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
<td></td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated artificially and erroneously inflates the housing need and key methods used to calculate the housing need have been withheld using excuses of dubious legality. The majority of students at the university do not settle in Guildford, are not long term residents - and should therefore be outside the scope of housing figures on the plan. No account has been taken of the “Brexit” factor, which is likely to further reduce demand from housing from non-UK nationals as migration is likely to be more tightly controlled.

2. Demographics would appear to indicate that the Guildford area, and Surrey as a whole, has an ageing population and a lower birthrate. Ultimately this will lead to the housing need being lower as more people will die, with fewer replacing them, so the existing housing stock could be sufficient.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. Specific Objections to the Draft Plan relating to Send

2. I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded.

3. Garlick’s Arch contains ancient woodland and is subject to flooding already. To build and tarmac over land here would either increase the flooding issue here or move the flooding on to nearby properties.

4. I object to the development at Garlick’s Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks’ notice and without any prior consultation and is not required in terms of housing need either for the village or the borough. The existing planning permissions within the village do not appear to have been taken into account in the figures set out by the council.

5. I object to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available and with plans for enhanced road access to make it more accessible.

6. The proposed new interchange on to the A3 will increase the traffic problems in the Send/Ripley area. The A3 and A247 are both at capacity (and probably beyond) and any small incident on either road can cause massive disruption on the surrounding roads. An accident or roadworks on the A247 can cause gridlock throughout the roads surrounding Send. The A3 is frequently at a standstill from the University interchange north to Burpham or Burnt Common and often as far back as the M25 in the event of accidents. The Transport Evidence in the Draft Plan is incomplete and shows that the A247 will suffer further congestion as Send would be used as a cut through to the A3/M25.

7. Many of the local roads, including large sections of the A3 and A 247, are in a state of disrepair with the road surface in an appalling condition in places. Further traffic would cause more damage to the surface, and the current practice of patching only increases traffic problems through congestion - but does not relieve them.

8. I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas which are much closer to existing transport hubs.

9. I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially - there exists a suspicion that this might be due to Send having had the temerity to elect a councillor from a group hostile to the council’s proposed plans for the Green Belt. If correct and evidenced, then this would be further grounds for prosecution of individuals for misconduct in public office.

10. I object to building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic, especially large vehicles. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more, and probably will not be able to cope with what will be generated from those developments already given permission without casualties.

11. I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

12. The sewage network in Send is already at overcapacity due to previous development being allowed by the council without due consideration of the amenities. Thames Water or their contractors are regularly called out to the main sewer through Send to unblock it and a number of properties along Send Road (including ours) have had waste spills in the gardens because of blocked sewers.

13. The heavy traffic through Send has been blamed by contractors from Thames Water for collapses within the main sewer along the A247. The increased use of the road by HGV traffic has increased the vibration on the road and the sewer is in sandy substrata which is susceptible to problems from vibration.

14. Any increased risk of flooding in the Send area raises the prospect of houses becoming unusable, uninsurable and unsaleable as a result of the wilful destruction of the delicate Green Belt. This is negligent at best and a criminal dereliction of duty while in public office at worst.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPS16/7190  Respondent: 11049185 / Alan Holden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send. The land at Wisley Airfield is adjacent to land with endangered species and any development could harm those species.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16125  Respondent: 11049185 / Alan Holden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Legality of Insetting of Villages from the Green Belt
2. Current case law in England is that any removal of land from the Green Belt for any reason and by any means is illegal unless there are special circumstances. This is also set down in the various planning frameworks. Insetting from the Green Belt for the purposes of freeing up land for building without special circumstances has been declared illegal in previous court judgements.
3. No special circumstances are set out in the Draft Local Plan. Proposing or following a course of action known to be illegal should be cause for investigation of those involved for misconduct in public office.
4. I specifically object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford. With no special circumstances given in the Draft Plan, the insetting of Send from the Green Belt would be illegal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity. Any development of housing should take place within the bounds of the Guildford Urban Area where sufficient public transport exists (the council having cut public transport out to the villages) and could be used by commuters. The very last thing that is needed is housing where the occupiers would require cars for commuting as that will just make the traffic problems in the area worse.

2. I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

1. Highways England have already indicated that the A3 is at overcapacity, having objected to further parking at the Royal Surrey County Hospital on the grounds that it would increase traffic problems on the A3. Any proposed development outside the town boundary will just put further pressure on the local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. The allocation of development to Send and the immediate surroundings is out of all proportion to what the area should be allocated for the size of the ward in the borough.

2. The proposed changes affecting Send take no account of the A3 being already at or over capacity. Highways England recently objected to the Royal Surrey County Hospital adding additional parking spaces to the hospital site as the A3 is over capacity and the proposals for Send would create similar or worse numbers of vehicles to that mooted for the holy car park. There are apparently no immediate plans for the next 10 years at least to upgrade the A3 in this area - and given that any incident on the A3 can lead to gridlock on the A247 through Send with the current traffic levels, no development should take place in this area.

3. Any development in and around Send will need to take into account the lack of public transport at commuting times of day and allow for multiple vehicles for each house or development- leading to an exponential increase in traffic in an already busy and over stretched road area and would lead to further instances of gridlock.
4. There is no provision for schools, road improvement or other services such as GP services in the Send area where such services are already at breaking point. Until the services are improved there should be no further development.

5. Surface flooding is already a problem in the Send area. While much of the village is slightly above the current flood plain, this is marginal and roads are subject to surface flooding as a result of existing development. Any further development in and around the village will increase both the flooding and surface water flooding risks.

6. We have recently received notification from the local water supplier that water supplies are under pressure after a drier than usual winter. That is with current levels of building. Any further building and development in the area will both increase the demand for water while increasing the flood risk and decreasing the amount of water entering the ground and thus leading to aquifer depletion and drought risk. Overall, the changes to the Local Plan are disproportionally increasing development in Send and the surrounding area at the expense of the Green Belt while ignoring the large stock of brownfield sites within Guildford itself. Those sites should be used before any development on Green Belt or before removing areas from the Green Belt for development. We strongly object to these changes to the Local Plan and urge that they be rejected and the development moved to brownfield sites, of which the borough has an ample sufficiency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4284  Respondent: 11049185 / Alan Holden  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. We object to Policy A42, the development at Clockbarn in Tannery Lane because it is too large a development for the village and will: increase the traffic problems on the A247 through Send, ignores the many previous objections, will make surface water flooding worse in the area and will impact on views from the Wey Navigation (which the Countryside Vision Strategy seems to support protecting).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4286  Respondent: 11049185 / Alan Holden  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. We object to Policy A58 for land at Burnt Common as there has been a decline in demand for industrial land since the original plan, not an increase. There is land already available at Slyfield and in Guildford itself for industrial use of the type proposed so there is no need for this development. The extra traffic from any such development will lead to traffic gridlock on roads that already suffer gridlock at the slightest incident.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. **The plan says that “allocating these sites does not grant planning permission for development.”** However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as IlI as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/3447  **Respondent:** 11049473 / Victor Bates  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.
It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.
The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council’s eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).
The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7566  Respondent: 11049473 / Victor Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Respondent: 11049473 / Victor Bates</th>
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I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7559  Respondent: 11049473 / Victor Bates  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also object to the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.
Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7563  Respondent: 11049473 / Victor Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7599  Respondent: 11049473 / Victor Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is
likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/”Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7587  Respondent: 11049473 / Victor Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.
There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/7581  **Respondent:** 11049473 / Victor Bates  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire):**

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students Ire accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7584  Respondent: 11049473 / Victor Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7596  Respondent: 11049473 / Victor Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations Ire available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7570  Respondent: 11049473 / Victor Bates  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.
Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

| Comment ID: | PSLPP16/7573 | Respondent: | 11049473 / Victor Bates | Agent: |
|-------------|---------------|-------------|------------------------|
| Do you consider this section of the document; complies with the Duty to Cooperate? | ( ) | Sound? | ( ) | Legally Compliant? | ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): | () |

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7577  Respondent: 11049473 / Victor Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7547  Respondent: 11049473 / Victor Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The
fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.
There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

**Comment ID:** PSLPP16/7551  **Respondent:** 11049473 / Victor Bates  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

**Comment ID:** PSLPP16/7541  **Respondent:** 11049473 / Victor Bates  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/7544</th>
<th>Respondent: 11049473 / Victor Bates</th>
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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”.

Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

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The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** SQLP16/1137  **Respondent:** 11049473 / Victor Bates  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** SQLP16/1140  **Respondent:** 11049473 / Victor Bates  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. "Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt." Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites-which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation

2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation

3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound

4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018

5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars

6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham

7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework

8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.

7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).

8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4389  
Respondent: 11049473 / Victor Bates  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are
already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4391  Respondent: 11049473 / Victor Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp17q/530  Respondent: 11049473 / Victor Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/342  Respondent: 11049633 / Sue Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We are writing to voice our concerns over the Draft Plan, and in particular Site A40, so we’ll begin with that one. How can it possibly be appropriate to build 120 houses on this site, when very recently Nigel Farley was refused permission to build two small, detached bungalows in Green Lane on the grounds of Inappropriate Development in the Green Belt, copy attached.

Access to Green Lane from the site would be difficult with Green Lane being little more than a single-track lane, extremely liable to flooding – we have had numerous occasions of raw sewage running down the lane - and the prospect of some additional 240 cars using it is unthinkable, along with the increased traffic turning in and out of Ockham Road North, particularly at the spot where local children cross to catch the Howard of Effingham bus. It is unlikely that many residents would even walk to the village shops, given that they’re a mile away with pavement on one side of the road only, necessitating crossing Ockham Road North by Waterloo Farm where traffic is often passing well in excess of the 40 mph speed limit and where tradesmen/delivery drivers/visitors seem to consider the footpath a parking zone.

It is interesting to note that the residents of Oakland Farm objected to an application for nearby dog walking on the grounds that their land was used by many native species of wildlife but don’t appear to care so much now that money is involved, letter attached.
If you add A37, 38, 39 and 40 together, this is an additional 395 houses in a small area which would have an extremely detrimental effect on traffic, schooling, medical centre. In addition, should site A38 also go ahead, the traffic on Long Reach would be much increased and given that during the football season, it is almost impossible to drive down this would cause much local disruption. If Wisley Airfield 2000 house development were also to go ahead, the whole area would be a nightmare.

The road surfaces in Ockham/the Horsleys are appalling. The Drift being spectacularly bad and with the ill thought decision to allow the golf club driving range to be allowed, traffic there and on Effingham Common Road will be disrupted and the roads further ruined.

The area is served by 2 train stations, neither of which have sufficient parking and we cannot believe that most commuters would walk or cycle to either given the narrow width of local road, no footpaths on much of the routes and no street lighting.

In general, we see the estimated population has increased by 4,938 since the last plan – where do these figures come from?? Also where are the increased 4,000 extra jobs coming from?

Traffic generally in the Ockham/Horsley/Ripley area is becoming a nightmare. There seems to be no time of day when there’s not a substantial queue to access the A3 London bound at Ripley. What the combined additional housing in Wisley, Ockham, the Horsleys would add to this is easy to imagine. And I have not looked closely at the plans for Ripley and Send but these would also have a huge impact.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 2 Bungalows refused permission.pdf (399 KB)
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A42 change at Clockbarn in Tannery Lane because:

- The increase to 60 homes in place of 45 homes is 33% more and too much
- It ignores all the hundreds of previous objections made by local people
- It will worsen access and traffic problems in Tannery Lane and at the A247 junction
- It will make erosion of the Green Belt in our village worse
- It will make surface water flooding, which is already bad, even worse
- It will impact open countryside views from the River Wey Navigation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the Policy A43 change at Garlick’s Arch because:

- It ignores all the thousands of previous objections made by local people
- There is no proven demand for Travelling Showpeople plots in this location
- It is beautiful permanent Green Belt and no “exceptional circumstances” exist
- It will cause over-development of our village and the number of homes is excessive
- It is exquisite ancient woodland that existed at the time of Elizabeth 1
- It will join up Ripley and Send and defeat the key purpose of Green Belt
- It is subject to frequent flooding and is currently a flood zone 2 allocation
- It is contaminated by lead shot accumulated over fifty years
- It will generate excessive traffic that will block up the local roads of Send and Ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The other main objection I have is to the A3 works at Burnt Common. I’m sure that GBC have already analysed the amount of traffic that passes from West Crandon and through Ripley having exited the A3 as it makes it way east through send along to Old Woking. The road is at over capacity during rush hours as it is and to be honest if Burnt Common become and on and off ramp for the A3 the Send Village will become a carpark not only at rush hour but all through the day. One can only imagine the quality of life for those living along Send Barns Lane and Send Road. The noise and pollution from vehicles would be unbearable and no doubt exceed all pollution levels with diesel and petrol fumes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to Policy A58 at Burnt Common because:

- It was deleted from the 2014 draft because of all the objections made previously
- The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land
- There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt
- The impact on small surrounding roads will create traffic gridlock
- It will join up existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4151  Respondent: 11049761 / Sharyn Mackay  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to object to the following elements of the Draft Local Plan: Strategies and Sites June 2016

- Policy P2: The removal of East and West Horsley from the Green Belt
- The construction of additional housing in West Horsley (sites A38 and A41)

The main aim of Green Belt is to prevent urban sprawl by keeping land permanently open. Developing sites A38 and A41 will undoubtedly contribute to urban sprawl. They are open expanses of land which give views of woodland and surrounding countryside and should not be altered in any way.

Whilst I understand the need for more housing I object to the high number of houses proposed. West Horsley seems to have a disproportionately high number of houses proposed. This will put an enormous strain on local facilities and infrastructure including:

1. The local primary school is already oversubscribed and the local secondary school for the Horsleys, (Howard of Effingham) also serves Effingham and Bookham and is already at full capacity.
2. There is one medical centre serving the Horsleys and it is extremely busy. Building such a large number of new homes in the villages will put too much pressure on the surgery.
3. There will be increased pressure on the rail service. The parking area at Horsley Station is small, always full on weekdays and has no room for expansion. There is an infrequent bus service through the villages and it is not a practical option for getting to work.
4. There will be a large increase in traffic in and around the village, especially when sites A38 and A41 are enough of a distance from the shops/medical centre and station to suggest people will drive rather than walk/cycle. Ockham Road and East Lane are busy, especially at peak times and are in a poor state of repair already.
5. There are areas in the village which suffer with flooding after heavy rain. Clearly the drainage infrastructure is already under strain and will not cope with so many additional houses.
6. The current state of pavements in the villages are inadequate – not continuous in some places – and are certainly not in a fit state for an increased numbers of residents.

One of the reasons our villages are so attractive and pleasant for both residents and visitors is the rural setting. Changing the density of housing and increasing the number of houses so drastically will change the appearance and feel of the villages forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: pslp173/521</th>
<th>Respondent: 11049761 / Sharyn Mackay</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Even without A36 and A41 there is still a total of 2395 houses being proposed in the Horsley/Ockham area and I feel very strongly that this increase in the number of houses in this area is disproportionate and will put local services and infrastructure under tremendous pressure. While I endorse the proposal to provide a rigorous bus service and cycle network from the Wisley airfield site to several railway stations, I feel that there will still be a significant increase in the number of car journeys made to those railway stations from this and the other proposed sites. The proposed developments at A37 and A38 will certainly increase car journeys to both Horsley and Effingham stations where the car parks are already full every day (only A39 and possibly A40 are within reasonable walking distance to Horsley station). There seems to be no proposal for enhancing local bus services, footpaths and cycle paths in the Horsley area to try to mitigate this.

The removal of A41 from the plan is to be welcomed as its possible future use for a relocated and enlarged primary school would represent a better use of the land than more housing and address my reservations regarding the level of primary school provision in the area. However, I assume the existing school site would then be used for housing, offsetting partially or entirely the housing removed from the plan by deleting this site. The removal of this site from the plan will not therefore result in a reduction in the adverse impact of the plan on the roads, medical facilities, shop and station parking in West and East Horsley. I would like to see the removal of this site accompanied by the removal of one of the other sites in West Horsley (A38 or A40) to achieve a genuine reduction in the amount of extra housing imposed on the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
statement covers any need to make upward adjustments, but makes no reference to any need to make downward
adjustments.

3. The most contentious issue in the proposed Local Plan is the housing target, which has been set equal to the
Objectively Assessed Need (OAN). The OAN is taken from the West Surrey Strategic Housing Market
Assessment (SHMA), Guildford, Waverley and Woking Borough Councils, Final Report September 2015. The
chapter on Monitoring and Review in the Final Report states:

“10.58 Through a proactive monitoring process it will be possible to maintain and develop understanding of the housing
market, building on the outcomes of the SHMA. It will allow the implementation of policies to be tailored to evolving
circumstances and inform future policy development.

10.59 Long-term monitoring which addresses indicators of housing need, market signals relating to supply-demand
balance, and the housing supply trajectory can inform future development and implementation of planning policies
for housing provision.”

The SHMA therefore foresees a need to review, and makes no presumptions as to what adjustments, upward or downward,
may be necessary.

1. The Draft Guildford Borough Infrastructure Delivery Plan 2016 is much more positive than the proposed Local
Plan as regards review. It states:

“1.2 This draft IDP will be subject to change up to and potentially during the Independent examination of the draft Local
Plan. The IDP Infrastructure Schedule is a ‘living document’ that will be reviewed and modified as required throughout the
plan period as further information becomes available in order to ensure that it remains up to date.”

1. There has been massive public disquiet concerning the housing target and the consequent need to build on the
Green Belt. The OAN itself has been the subject of detailed criticism. My judgement is that the OAN predictions
are fragile. They depend greatly on predictions of population growth, and much of this is ascribed net
international immigration. In the present political climate predictions of immigration must be subject to much
uncertainty.

2. I judge that the proposed Local Plan should include an explicit commitment to review its key targets, especially
the housing target, every five years, say. This commitment should use positive wording and should cover all
eventualities be they upward or downward.

9. At the very least, the wording of paragraph 1.19 should be amended along these lines

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Appendix A2 Evidence of active and comprehensive marketing

This new exposition of strengthened policy is welcome.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/107  Respondent: 11051521 / J and M Baylis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix A: Glossary

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Enlarged definition of Viability noted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Enlarged definition of Viability noted.

Attached documents:

Comment ID: pslp173/110  Respondent: 11051521 / J and M Baylis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Many schemes now ‘Developer funded’ instead of ‘Developer contribution’.

SRN7 and SRN8 (A3 slips) now ‘committed’.

LRN23 new Onslow Street/Woodbridge Road junction works.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/111  Respondent: 11051521 / J and M Baylis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix E: Superseded policies
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The new paragraphs above the Table are very welcome.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/112  Respondent: 11051521 / J and M Baylis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix G: Policy and monitoring

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

New D4 very welcome, but there should be a positive indicator, with no target, such as number of new buildings achieving a national award for design.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/239  Respondent: 11051521 / J and M Baylis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Key facts

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2.3 The forecast of population growth from 145,473 in 2015 to 167,126 in 2034, 15%, will be contested by GRA. I agree with GRA’s analysis

2.8 “a cluster of gaming companies in Guildford town centre”. I wonder where the evidence for this is, and is it significant compared with employment elsewhere in the Borough?

2.10a, 2.14a, 2.14b: I welcome this strengthening compared with the struck out 2.22.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<tr>
<td>Strengthening of D1 (1) welcomed</td>
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<td>I accept the deletion of the list in the Policy box and 4.5.8, and their replacement by the new Policy D4</td>
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<td>4,5.37a: it is not obvious why viability should be a reason for exemption. Exactly the same argument could be applied to affordable housing:</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I welcome the considerable strengthening of this Policy. It will serve the Borough well.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Number of new jobs increased from 3,200 to 4,100 but floor space and land provision reduced. Is this justifiable?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp171/252  Respondent: 11051521 / J and M Baylis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In Policy E3 (2) and 4.4.28 there should be a stronger reference to the new Appendix A2: this Appendix is a significant strengthening of policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/253  Respondent: 11051521 / J and M Baylis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4.4.41 10 hectare extension welcomed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/254  Respondent: 11051521 / J and M Baylis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I regret the striking out of the ‘Vision’ box. It is a fine statement of intent and the additional words in 4.4.74 do not compensate for its loss. It should be retained. Furthermore I consider that the Vision should include the new strategic infrastructure necessary to the good functioning of the town, especially the future of the gyratory and bus interchange provision. I would advocate the new bridge proposed by GVG.
The Policy should include a clause on provision of employment floor space: see comment on E2 (1) above. As it stands the Plan is inconsistent here. There should be a Monitoring Indicator for employment floorspace.

I consider that retail need figures for new floor space are over-estimated.

I strongly believe it is misguided to strike out the A&M Vision and TCMP as Key Evidence and to qualify the Town Centre Regeneration Strategy as carrying no weight (see Evidence Base Other Plans and Strategies). The result is that there is no strategic spatial evidence for this, the most important part of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/255  Respondent: 11051521 / J and M Baylis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Introduction of ‘Main town centre uses’ noted. Do these also have some relevance to Policy E7?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/256  Respondent: 11051521 / J and M Baylis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E9 (10) includes a new statement on marketing (12 months etc.). Why is there no similar statement in E8?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/245  Respondent: 11051521 / J and M Baylis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1
New provision for self-build and for accessible accommodation noted. Removal of all density policy noted.

4.2.18 contains a reference to windfall sites for student accommodation. Windfall sites will also contribute to meeting general housing need. The Plan should take account of this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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4.2.40 I consider that “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost.” should be retained.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?


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Strengthening of Policy ID1 (1) and the new (2) and (3) welcomed. Dependence of housing delivery on infrastructure provision is now clearly stated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/261  Respondent: 11051521 / J and M Baylis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Removal of specific A3 options in 4.6.18 noted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/262  Respondent: 11051521 / J and M Baylis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Elimination of much of (2) (d) about parking and its replacement by new (4) welcomed.

Key paragraphs 4.6.28 and 4.6.30a noted.

This Policy is grossly deficient as regards provision of new or extended Park and Ride facilities, despite the signaling of need in 4.6.30a.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/247  Respondent: 11051521 / J and M Baylis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P1
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<td>Noted that Policy P1 (1) has been reduced but there is a new Policy P1 (3)</td>
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<td>4.3.8 Welcome further information on the AGLV review.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I regret that the Plan does not include any intention to seek moderation of TBHSPA policy.</td>
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<tr>
<td>4.3.64a: Specific reference to policy NRM6 of the South East Plan noted.</td>
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4.1.9 Noted that North Street is now included as a Strategic Site.

Housing numbers now given, rising from 450pa to 850pa over the 15 year period 2019 to 2034, totaling 9,810. This leaves 2,616 to be delivered during the four years 2015 to 2019, an average of 654 per year. This looks unrealistic compared with the numbers for the subsequent four years 2019 to 2023, which total 1,900. I do not understand why the table in the LAA shows a target of 654 for the first four years. For all subsequent years the targets follow an upward profile. Why not start at 380, the 2015/16 net completions, and profile up more steeply from there? The early deficit would then largely be removed. The use of 654 for the first four years appears to be highly arbitrary. Furthermore the sudden start of so many sites in 2019/20 seems highly artificial. However I support the general strategy proposed, except that the total number of new homes needed is less than 12,426.

"4.1.9a The figures set out in the Annual Housing Target table sum to a total of 12,426 homes.” This is not made obvious: see above.

4.1.9b. It is not clear in the Plan where the crucial evidence is for the rolling five year supply in the short term. A Table roughly like Table 1 should be replaced by a diagram which gives a broad brush picture of how the housing target will be delivered over time (i.e. the diagram in the LAA). Some of the key LAA information should be brought into the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp171/240  Respondent: 11051521 / J and M Baylis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Vision and objectives

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

12,426 homes over 19 years equals an average of 654 homes per year. GRA will contest the need for so many homes. We agree with GRA’s analysis.

Where are the 240ha of new open space? Is this shown on the proposals map?

There are no proposals in the Spatial Vision to improve transport infrastructure, despite the statement in the Foreword that “The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan.” The Spatial Vision has plenty of site specifics on new housing, and some specifics on new employment land. It should have key specifics on new infrastructure, especially transport. (The subsequent 13 Strategic Objectives are totally non-specific).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3269  Respondent: 11051649 / Andy Lewis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wrote in 2 years ago to object to the last draft Local Plan and was delighted that you withdrew it to revise it. However, I am very disappointed to see so many problems reoccur in this new plan. Whilst there are some laudable aims stated, in many cases the plan itself fails to deliver, and I strongly object to this new draft local plan.

1. Housing need calculations

Once again it appears that the data and hence analysis is flawed. Last time you had over-inflated the housing need, and it has got worse not better this time! I strongly OBJECT to the need to create so many new homes. I understand that this has been performed by an external agent, and no basis of calculations have been provided. Moreover, under Brexit, immigration will fall, and so the number of homes required is doubly excessive. I believe that GBC is seeking to maximise the number of homes in order to boost its income rather than actually meeting any rational housing need. As this drives so many of the other unacceptable features of the plan, the LDP should again be rejected and GBC should actually listen to the voices of the residents and plan in a measured, reasonable, and sustainable manner that doesn’t seek to destroy the wonderful heritage that Surrey provides. Do not be the council that presides over the destruction of centuries of countryside at the behest of developers pushing for profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPA16/3270  Respondent: 11051649 / Andy Lewis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Existing villages such as the Horsleys have insufficient infrastructure to provide for the development proposed.

I totally object to the need to expand the villages and I OBJECT to the plan to create new settlements such as that proposed at the Wisley Airfield site. The plans do not have the good road, rail, shopping, education, health and leisure facilities to support the new settlements such as Wisley Airfield.

Moreover, it seems perverse in an age of fundamental shift from physical to virtual (internet) shopping, that GBC are still considering massively increasing the area for retail. Some of the areas earmarked for unnecessary shopping facilities could be far better used to meet the perceived housing need and allow protection of the environment that this draft LDP seeks to change for the worse for ever.

Plans proposed have not considered the infrastructure and are fundamentally unwise

Notwithstanding that these plans go against statutory direction, there are additional reasons why many of the consultants’ proposals are flawed. Real concerns of sustainability and viability, together with almost no real impact studies, show that these plans are constructed to meet a political agenda, rather than rational assessment that would have discounted them. I OBJECT to the plans for the following reasons:

- Flooding

In recent years, flooding has become a severe national problem. In the 5 years we have been in East Horsley, there has been significant flooding on the roads each winter. The water table is high, and the drainage system is quite obviously incapable of handling run-off. Removal of more trees and fields to create dwellings will only exacerbate the problem.

- Transport

Many of the proposed villages for development sites struggle already with road and rail infrastructure. For example East and West Horsley, and the Wisley airfield site, are served by the Guildford via Cobham branch line, which is already creaking at the seams at rush hour. With existing population levels, the morning trains are often full after Effingham Junction, even though 10 car trains have been introduced to cope. It is totally impractical to add significant numbers of commuters to our current load. Moreover, the car parking at Horsley and Effingham Junction is barely adequate now. The rail link is simply so congested that it is impossible to contemplate building 3000 new homes in the Horsley/Wisley area to feed into the currently stretched system, let alone the homes in Merrow that will also make commuters lives a misery on the Cobham line.

In terms of roads, they are narrow and struggle with the existing capacity. The major access link is onto the A3, and Old Lane would be completely overwhelmed by the proposals. While there is, this time, indication of junction modification on
the A3 at Burntcommon, it is apparent that even SCC are unaware of whether this can be sufficient in any way. It certainly doesn’t appear to be serving the Wisley site. Hence, for transport reasons, it is totally unacceptable to be recommending such a massive and unsustainable development.

Even if additional access were provided at the Ockham Junction, not all traffic would use that exit – at least 50% would use the Old Lane access either to the A3 or to Horsley/Effingham. Planning to build nearly 3000 new homes at Wisley Airfield, Send and the Horsleys, would yield more than 6000 new cars in the area. This is totally impractical and would overwhelm the existing infrastructure, consisting as it does of very narrow rural lanes. Therefore I OBJECT to the draft plan on the basis of the road and rail infrastructure being total inadequate for the planned development.

GBC should also look very closely at the horrendous traffic problems round the Wooden Bridge area of the A3 and the A25 at Ladymead that occur every working day, and recognise that additional traffic from increased housing would be a disaster.

- Schools and Medical centre

Simply unable to cope with more demand.

**Fundamentally Flawed Assessment of East Horsley parade of shops as a Rural District Centre capable to support increased levels of trade from new developments**

East Horsley’s parade of small shops is characterised as being 3rd largest in the whole of the Guildford area in terms of size and facilities!, after Guildford town centre and then Ash Vale. This belies that fact that it is no more than a small village facility and certainly not a Rural District Centre (which requires more than 30 retail outlets and we appear to have about 25). Road and rail infrastructure is insufficient; car parking insufficient; space available insufficient to allow any further retail development (if any were contemplated – and it should not be contemplated). Such designation implies relaxation of planning restrictions that would forever change the nature of our village, and I OBJECT to East Horsley shopping parade being classified as a Rural District Centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/13421  **Respondent:** 11051649 / Andy Lewis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Affordable Housing

GBC is seeking to provide a policy that provides affordable housing, and meets the criteria for 40% of new housing being affordable. But in almost every regard, the LDP fails to deliver this. What is really important is that young people in the GBC area are able to buy their own homes. GBC thinks it is acceptable that rented homes, student accommodation, and travellers pitches can be sufficient. Travellers pitches are needed, but by no means should they count towards affordability measures. Student homes are for transient population, and we need to provide affordable homes for the next generation to settle in our midst – in the villages as well as Guildford town centre.
However, it appears that GBC are more than happy to let developers buy their way out of providing affordable homes for purchase in the rural villages (where they are needed), but committing to build more rented accommodation elsewhere in the Guildford area. GBC should mandate that developers stop building massive homes and provide proper sustainable development – but in keeping with the existing surrounding density, not at the density proposed in the infill locations.

A further issue arises in the LDP in that there is no attempt to address the issue that affordability ratio is over 10 compared to the national average of just under 6.5. This is a serious issue and warrants more extensive consideration and treatment, but is glossed over in the LDP.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. **Green Belt Protection**

Green Belt status is a vital protection for our environment, our way of life, and our communities. While GBC is seeking to make massive detrimental changes to meet their perceived but wrong housing need, I believe in any case that meeting housing development need is not sufficient grounds to amend the Green Belt. **Therefore, I strongly OBJECT to any changes to the Green Belt being made for housing reasons.** Our villages should retain their Green Belt status to preserve the culture, the environment, and provide a barrier against the continual and pervasive over-population of our beautiful countryside.

I would remind GBC that there needs to be “exceptional reason” for any village to be removed from the Green Belt, and that housing need to make up development plan numbers is NOT one of them. Where there is need to add housing, use brownfield and extend the current larger communities such as Guildford and Woking to meet needs – where the infrastructure can support the growth. Please consider refusing planning for future new supermarkets such as Waitrose in Guildford, which was not needed, and build housing to the maximum capacity instead. It is simply outrageous that the plan entails over 65% of the new housing being planned for current Green Belt areas.

It is counter to national policy to remove the highest level of statutory protection and rely on conservation areas and other changeable planning policies. Therefore, I can only conclude that the proposed changes to the Green Belt are being done simply to remove any objections to the future development. Hence, **there should be NO CHANGE to the Green Belt status of the villages concerned.** The LDP therefore needs to be amended to remove the proposals to remove Green Belt status and remove development plans seeking to build on current Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Concluding remarks

In summary, there are several significant areas of major objection to the LDP that impact on life in the Surrey villages. The LDP appears to have specifically gone against national Green Belt policy that states that meeting housing need is absolutely not a valid reason for re-categorisation of Green Belt. This plan is therefore ill-considered, and needs to be re-worked from the ground-up and taking full account that Green Belt villages cannot be re-designated to get round planning laws. GBC should seek to

1) get accurate (and hence far lower) housing demand forecast, and provide objective evidence for their forecasts
2) find ways to meet this without sacrificing Green Belt nor existing village character and community, and
3) before deciding to recommend plots for development, actually consider the real implications on rural lanes and other infrastructure when the plots are amalgamated

GBC should be protecting the Green Belt, the villages and the way of life that we have all come to know and love. Let’s use the plan to do that, not destroy it in many areas, as seems to be the likely outcome from the current draft plan. You have the power to protect for the next 20 years at least, or the ability at a stroke to destroy forever the heritage we cherish. As councillors and planners, you have this important responsibility – please do not take it lightly on the basis of flawed assumptions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLA16/3468  Respondent: 11051809 / David Tilman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object in the strongest terms to the local plan for Horsley.

I have lived in East Horsley for over 21 years and it is a lovely place to live and work.

I am in no doubt that if any of the proposals contained within the local plan are followed through then we will lose what makes the Horsleys a vibrant and complete community.
We are a village, and we act like a village and it is worth holding on to this.

Removal from Green Belt

What is the point of the Green Belt if it can be removed on a whim? What are the exceptional circumstances that have been demonstrated for this to apply. I would appreciate a response on this point.

Settlement Boundaries.

This decision too seemed to have no basis. There is scope to build additional houses within the boundary (in much lower numbers) and it is vital that we retain the Horsleys as a distinct village.

Infrastructure

There is no doubt that the infrastructure within the village cannot cope with the number of additional houses proposed. The parking at the station is full to overflowing, there is constant heavy traffic already on our narrow roads - particular problems on Ockham Road South and the drainage system fails every time we have a heavy shower. I do not have personal experience of local schools but I understand they are full and that medical facilities are stretched. We have quite a lot of older people in Horsley and they are a greater burden on the Health Service and deserve to be treated quickly.

Station Parade

The erroneous designation of Station Parade as a District Centre seems to have happened because somebody pressed the wrong button on their calculator. We have a collection of village shops - no more - and the village is not equipped to cope with the development proposed.

Villages at Ockham and Burnt Common

The impact of these proposed developments on our village would be enormous - extra traffic before and after complete and the demand for facilities within the village.

Concern over Housing numbers
It is hard to believe that there is sufficient demand within our area for so many houses. No one objects to "infill" but this is a major change in the shape of our village which seems to have been decided on against all the evidence. Is it true there is sufficient brown field land within Guildford to build a large proportion of these homes? I would appreciate a response to this.

I am concerned that some local businesses are being sacrificed in order to build houses that we do not need. Two local businesses are about to disappear as a result of the new Opera House (construction traffic is already a problem)

While most younger residents work in London there are many middle aged and older people who work locally. It is one of the joys of living in Horsley that friends and neighbours are truly part of the local community. It is important that we retain this balance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/4</th>
<th>Respondent:</th>
<th>11053761 / Anne Rankin</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (Yes), is Legally Compliant? (Yes)</td>
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I think that the number of houses allocated to this site is ridiculous, I don't have a problem with houses being built here but the number suggested is far too high. The infrastructure in the area can not cope with that amount of additional cars/people. Where are the children going to go to school? Send CoE is already oversubscribed as is Ripley primary and then it is a whole different ball game with secondary schools - there is just not the availability of places.

Also the access on and off the A3 even if you add an additional junction at Burnt Common to go North Bound, it is going to cause an already busy road to be choked every day. Yes it would relieve the amount of traffic going through Ripley but Send Barns Lane and Send Marsh Road will become a nightmare - especially as the new entrance to Send School will be in Send Barns Lane and both roads are used to cut through to Woking. And if the Wisley Airfield gets granted the whole area is just going to be inundated with cars spoiling an otherwise quiet haven between Woking and the M25.

Please do not grant that many houses on this site!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Comment ID:** PSLPA16/3102  **Respondent:** 11053825 / Claire Owen  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/3103  **Respondent:** 11053825 / Claire Owen  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
• It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/6227  **Respondent:** 11053825 / Claire Owen  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents
2015

- 21 Oct 2015 – A247 near Shell garage - Three vehicles collided causing delays

  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.
The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID**: PSLPS16/6228  **Respondent**: 11053825 / Claire Owen  **Agent**: Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down
the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.
The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/12835  **Respondent:** 11053825 / Claire Owen  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/12845  **Respondent:** 11053825 / Claire Owen  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.
I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and
it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12833   Respondent: 11053825 / Claire Owen   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12834   Respondent: 11053825 / Claire Owen   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12848  Respondent: 11053825 / Claire Owen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for “overdevelopment”/”Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12844  Respondent: 11053825 / Claire Owen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/12841  **Respondent:** 11053825 / Claire Owen  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students I OBJECT accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/12842  **Respondent:** 11053825 / Claire Owen  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12847  Respondent: 11053825 / Claire Owen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”
The wording of the policy is far too wide and drives a coach and horses through all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be "closely related" Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances." The size and location of sites should be better defined and it should be clear market housing cannot be included.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.
Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12837  Respondent: 11053825 / Claire Owen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12839  Respondent: 11053825 / Claire Owen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12830 Respondent: 11053825 / Claire Owen Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from
the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least
one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/12829 **Respondent:** 11053825 / Claire Owen **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**I OBJECT to the Borough Wide Strategy (Policy S2)**

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere.
Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1526  Respondent: 11053825 / Claire Owen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:
1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SLP16/1527   Respondent: 11053825 / Claire Owen   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SLP16/1528   Respondent: 11053825 / Claire Owen   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

1. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

2. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford’s circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

3. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites-which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

1. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

2. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

3. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation

2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation

3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound

4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018

5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham

7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework

8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1529  Respondent: 11053825 / Claire Owen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.
Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp173/339  **Respondent:** 11053825 / Claire Owen  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/2565  **Respondent:** 11053825 / Claire Owen  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

Clandon Cross Roads Area to Bulls Head - 17 incidents
Bulls Heads Head to Bennett Way - 8 incidents
Bennett Way to Highcotts Lane - 15 incidents
Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015
21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
Surrey Fire and Rescue deployed.

2016
15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.
No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp171/985  Respondent: 11053825 / Claire Owen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/986  Respondent: 11053825 / Claire Owen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

Review for duly made

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.
In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/996  Respondent: 11053825 / Claire Owen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire):()

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued
to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.
The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/984  Respondent: 11053825 / Claire Owen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp17q/137  Respondent: 11053825 / Claire Owen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

2. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/138  Respondent: 11053825 / Claire Owen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 2: Legal Compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.
The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp17q/139  Respondent: 11053825 / Claire Owen  Agent:


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

"Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt." Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites-which amount to 65% of the proposed housing number.

Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best,
infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce 
the quality of life for residents through congestion and disruption.

The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, 
schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that 
Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as 
a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan 
consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market 
Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford 
until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow 
with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for 
Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC 
and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy 
Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under 
Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and 
Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and 
foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both 
technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic 
issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it 
overstates housing need. The Council has prevented councilors or others from properly considering the SHMA 
by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s 
circumstances, including in particular the Green Belt and road infrastructure. National policy permits such 
constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on 
a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required 
infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have 
the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the 
Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and 
Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4411  Respondent: 11053889 / Claire Handley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY P4 (FLOOD RISK AND WATER PROTECTION):

Flooding across the country last winter clearly demonstrated the danger of overdevelopment and pressure on local drainage systems. I have concerns that building this number of homes, with much high density development, will lead to flood risk in the local area.

The proposed development in the Horsleys and the Three Farms Meadows (site A35 - the former Wisley Airfield) is unsustainable and will lead to environmental issues both at a local level and in adjoining areas downstream.
The huge scale of proposed development at A35 - Three Farms Meadow will have a huge impact on Ockham, the Horsleys and other surrounding communities. The scale of development will change the nature of these villages irrevocably, creating in effect a new town in a protected green belt area and overwhelming the local amenities, infrastructure and character. The draft Plan has failed to provide substantive evidence of a specific and defined need for large scale high density social housing in the local area.

In conclusion, I strongly object to its proposals as referred to above and believe that the proposed development would seriously detract from the very special character and nature of the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4412  Respondent: 11053889 / Claire Handley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Finally, I STRONGLY OBJECT TO POLICY A35 (WISLEY AIRFIELD) this proposal should be rejected for all the reasons the Planning Committee rejected the identical recent proposal by Wisley Investment Properties. There are no “exceptional circumstances” which can justify building on the Green Belt and destroying this area of natural beauty. The Council have sought to misrepresent the site as brownfield – but only 15% of it is developed. The proposals would irreparably damage the rural feel of Ockham and surrounding villages and lead to the creation of a small town – but with no opportunity for commensurate extension of infrastructure and development of necessary supporting facilities (or employment opportunities). This makes the proposals wholly unsustainable – without adequate provision for transport facilities, wastewater capacity and runoff, local schools, medical and other amenities, road capacity and flood prevention.

The development would create an isolated urban development but with none of the benefits of urban living and destroy the rural community. The proposed housing density is excessive when compared with existing development in the villages and the new developments would not blend with the existing developments.

The draft Plan fails to address the collective and hugely destructive impact of this site on a small part of the borough which lacks the infrastructure (particularly transport) to support it. It is disappointing to note that the total amount of new building is totally out of scale with the planned development elsewhere in the borough, especially less sensitive urban areas which are not protected by Green Belt.

The development is unsustainable for all of the reasons outlined above. Ockham is a beautiful, very rural village and the proposed development will utterly destroy the village which will be subsumed in a “new town” urban sprawl. The impact of this development on all neighbouring communities cannot be underestimated. The Council have failed to demonstrate any collective impact assessment on the surrounding area and communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9599  Respondent: 11053889 / Claire Handley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object to Policy H1 (HOMES FOR ALL) on the grounds that the Policy doesn’t set any constraints on building and the housing mix has been based on pre-Brexit growth and demographic assumptions which are now unproven and should be subject to review.

The draft Local Plan has failed to compel the University of Surrey to use its many planning consents and existing space, such as car parks, to provide required student accommodation. If the University were made to take responsibility for accommodating its students on the land which it already owns but fails to efficiently utilise, this would free up housing stock within the City to be utilised to answer any housing requirements identified by the Local Plan.

The proposals for development contained in the Local Plan impose a disproportionate amount (the majority) in Green Belt land and provides too few new homes in urban areas such as Guildford city centre where transport links are better and work opportunities are greater facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9597  Respondent: 11053889 / Claire Handley  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

I also object to Policy H3 (rural exception homes) which loosens the criteria by allowing “market housing” and development that changes the housing mix. Developers would be able to override NPPF “exceptional circumstances” and other restrictions to build large houses in the Green Belt.

The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. Under existing law, an unfulfilled housing need is not an exceptional circumstance. Conversely, the existence of the Green Belt/Area of Outstanding Natural Beauty is a legitimate legal reason for not meeting objectively assessed housing need. The draft Plan fails to demonstrate substantive evidence that other development options have been thoroughly investigated and found to be untenable and therefore I object to any proposal to remove greenbelt designation from East and West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9604  Respondent: 11053889 / Claire Handley  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
OBJECTION TO POLICY I1 (INFRASTRUCTURE & DELIVERY) AND POLICY I2 (SUPPORTING DTP’S ROAD STRATEGY): the Council have failed to consider and take proper account of existing and increased pressures on infrastructure in setting out its development plans. The proposed and excessive housebuilding in our rural communities and countryside / green belt land is not supported by any funding or provision for infrastructure which is a key flaw in the Plan. The Council have failed to provide any plan for organic increase in existing traffic congestion, let alone capacity to accommodate the huge increase in demand / burden once thousands of houses are built across the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Policy i3: Sustainable transport for developers versus finite and inadequate local Infrastructure

I OBJECT TO Policy i3 and the Local Plan’s woefully inadequate provision for transport and infrastructure arrangements to support its housing and development plans. The policy fails to provide any concrete obligation on developers to address weaknesses in transport – and there are practical reasons why this will not be possible in East and West Horsley and the surrounding villages (including Ockham / Wisley).

Road widths will not accommodate increased bus use through the villages and I see no acceptable solution to the need to provide access from the newly developed houses to employment which will, inevitably, be based outside of the village communities. Busses and lorries are frequently forced into the middle of the roads to manoeuvre around bends or avoid tree branches, exacerbating congestion. Pavements are narrow and there is no scope to widen thoroughfares to accommodate the inevitable increase in traffic. Local rail station car parks are already full and rail services are woefully overcrowded, particularly heading to / from London where many of the employment opportunities lie. Road-widths combined with the size of many modern cars and commercial vehicles make commuting by bicycle totally unsafe and there is no room for the provision of cycle lanes. New residents will have few options but to commute to work by car, leading to an unacceptable level of traffic on the roads through Ockham and the Horsleys. The draft Plan fails to recognise that the majority of the infrastructure in East and West Horsley is finite, is not capable of expansion and has no capacity to absorb a large increase in population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</th>
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I OBJECT TO POLICY I3 (SUSTAINABLE TRANSPORT) as the policy which fails to address the real life constraints and demands of modern life. In failing to recognising employment opportunities (or lack of them) within the local communities, the Council’s proposals are unrealistic and fail to address the commuting pressures of the population who will occupy the proposed new housing developments, frequently located on the village fringes. The majority of people cannot or will not walk or cycle – commuters are in a hurry and many will already face a long commute to work. The elderly, children, people with disabilities or who are unwell or unfit, or simply people carrying heavy shopping will not walk or jump on a bike. Life in a village is very different to life in an urban area and the Council failed to address these differences. Roads in the Horsleys are narrow and in a poor condition making them hazardous for cyclists – pavements switch from side to side or disappear completely, are narrow, often overgrown and not suitable for hugely increased numbers of people (particularly families with buggies / young children).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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I to all proposals to remove East and West Horsley from the Green Belt – this would severely damage the very special nature and character of these villages and remove a vital amenity enjoyed by both the London and local population. The importance of our Green Belt as a public and private asset in terms of tourism, leisure, agriculture and heritage have been overlooked. There is no justification to extend the defined East and West Horsley Settlement Boundaries. The Green Belt serves a vital role in providing clean air and combatting pollution and has greater importance and value today than when it was first conceived. The deliberate protection of rural villages from the expansion of Greater London and surrounding towns goes beyond the convenience of developing new homes on green field sites. Our local council has an obligation to consider and exhaust all other exiting development opportunities such as redevelopment of brownfield sites (such as those owned by the University of Surrey), sites already allocated for development (but not yet developed) and should be striving to protect the Green Belt and the historic integrity of local villages. Our Green Belt meets all five legal purposes for Green Belt designation:

- To check the unrestricted sprawl of large built up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.
The Council should look to encourage re-use of derelict sites and for the consolidation of commercial businesses to allow for re-zoning existing commercial or light industrial sites for residential use. The Council has ignored the impact of Green Belt development on flood control and on carbon sink. It has also failed to address the knock-on effects for air pollution and climate change.

The Green Belt provides an irreplaceable habitat for Britain’s declining wildlife which no amount of “newt tunnels” and “bat boxes” can replace. Our native bee population is already in decline and the Local Plan fails to address the impact on biodiversity, wildlife and our natural heritage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9603  Respondent: 11053889 / Claire Handley  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also wish to OBJECT TO POLICY P3 (COUNTRYSIDE BEYOND THE GREEN BELT) and was very disappointed to note that the proposed draft Plan gives Ash and Tongham more protection than the rest of borough, including existing Green Belt, although these villages do not contribute to preventing London sprawl – unlike East and West Horsley, Ockham etc. Without wishing to be cynical, I would question whether due process has been followed in developing the draft Plan where there appears to be special treatment of a ward represented by the current Council Leader and his predecessor. With questions around political bias, the draft Plan should not be approved as it is currently drawn.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9600  Respondent: 11053889 / Claire Handley  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objection to Policy S1 – Objection to GBC’s plans for “Sustainable Development” within East & West Horsley and Ockham / Wisley Airfield

I object to the proposed development of so many new homes within East / West Horsley and Ockham / Wisley – the proposals are not sustainable and will damage the character and amenity of the villages. The facilities and services in the villages are limited and not extendable. Local schools and medical practice are already over subscribed and the train station
car parks at Horsley and Effingham Junction are full to capacity, with no room for expansion. In summary the proposals to build such a huge number of new homes are unsustainable in terms of schooling, drainage, roads capacity, shops and parking in East Horsley (shops and station) and public transport – with limited capacity for busses on narrow roads.

I would support the relocation and expansion of the Raleigh School in West Horsley onto a new self-contained site within one of the sites designated for housing site A41 being the most suitable for such development. To that end, a new school would amount to “exceptional circumstances” under NFPP guidance – the existing site is constrained and woefully inadequate to provide suitable facilities for the 435 children on the roll. There are substantial waiting lists in every year except reception and the existing school playing field, being separated from the main school, is virtually unusable except on limited occasions when parent helpers can chaperone children across roads and temporary toilet facilities can be hired. The existing draft Local Plan fails to recognise the need for a new school to accommodate existing demand in the Horsleys and surrounding locale.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/2955</th>
<th>Respondent: 11054049 / Clare Goodall</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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1. **APPENDIX C**

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/2953</th>
<th>Respondent: 11054049 / Clare Goodall</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
APPENDIX D

1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)
   - The “objectively assessed need” figure of 693 homes a year is too high.
   - A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
   - The current SHMA inflates the proposed housing figure due to
     - failure to correct for errors in the historical data for international migration flows,
     - issues with the way it considers students and affordability and
     - flaws in the method for estimating the number of homes needed to support job growth.
   - It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6027  Respondent: 11054049 / Clare Goodall  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY A25 - Gosden Hill Farm

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.
It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.
The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 11054049 / Clare Goodall</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **POLICY A43 AND A43a – Garlick’s Arch**

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council’s eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).
The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12323  Respondent: 11054049 / Clare Goodall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY D3**

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/12333  Respondent: 11054049 / Clare Goodall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D3

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12334  Respondent: 11054049 / Clare Goodall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12317  Respondent: 11054049 / Clare Goodall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E1

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12319  Respondent: 11054049 / Clare Goodall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12321  Respondent: 11054049 / Clare Goodall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E5

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12336  Respondent: 11054049 / Clare Goodall  Agent:
I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12330  Respondent: 11054049 / Clare Goodall  Agent:  Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students are accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university’s ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12331  Respondent: 11054049 / Clare Goodall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H2

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.
It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/12335  **Respondent:** 11054049 / Clare Goodall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. **POLICY H3**

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150
homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium
development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I
believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued
to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected
to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity -
only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers
under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy
mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that
cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including
the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear
market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12326  Respondent: 11054049 / Clare Goodall  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY II

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure
(Policy II)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane
junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause
greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on
these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for
only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a
further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around
these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more
congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the
villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and
with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Comment ID: PSLPP16/12328  Respondent: 11054049 / Clare Goodall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY I2

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12329  Respondent: 11054049 / Clare Goodall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY I3

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12312  Respondent: 11054049 / Clare Goodall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I
assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that
the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of
these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that
infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is
all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development,
claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines.
The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this
policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated
to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the
Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I
cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could
quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of
opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their
surroundings” and other NPPF provisions.

Paragrapgh 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an
untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield
(A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires
there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt.
There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special
circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging
into one another. The significant development in these villages will result in the character of these villages being lost and
the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support
including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common,
with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/12315  **Respondent:** 11054049 / Clare Goodall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
1. POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12307  Respondent: 11054049 / Clare Goodall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of
sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)
The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would
remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: SLP16/1461</th>
<th>Respondent: 11054049 / Clare Goodall</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)
1. I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: S MLP16/1462  Respondent: 11054049 / Clare Goodall  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: S MLP16/1463  Respondent: 11054049 / Clare Goodall  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt. ” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1464  Respondent: 11054049 / Clare Goodall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.
Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/7307  **Respondent:** 11058817 / Janet E Sims  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed development of Wisley Airfield, particularly in the light of the recent decision by Guildford Borough Council to refuse the planning application. This should not have been included in the revised plan and provides further evidence that the entire plan is flawed and will cause massive destruction of the local environment. The impact on local villages particularly in regard to traffic in Ripley will be severe.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/7308  **Respondent:** 11058817 / Janet E Sims  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to this development on the Wey flood plain. Further development in this location will increase the likelihood of flooding and also increase traffic levels on Tannery and Papercourt lanes which are single track country lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7309  Respondent: 11058817 / Janet E Sims  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this proposed development on existing green belt, its siting by the A3 will expose residents to noise and poor air quality from the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7310  Respondent: 11058817 / Janet E Sims  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this proposed development on existing green belt, its siting by the A3 will expose residents to noise and poor air quality from the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16317  Respondent: 11058817 / Janet E Sims  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

I object to this development on green belt land, Ripley has absorbed many new dwellings over the last few years, this is now starting to create severe parking problems for residents and visitors reducing the attraction of the village and potentially damaging the existing businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- Removal of attractive, thriving villages from the green belt including Ripley, Send, West Clandon creating the prospect of an urban sprawl merging with Woking particularly when developments in that Borough are taken into consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- Flooding is endemic in the area of north Surrey, further developments adjacent to flood plains for example site A42 Clockbarn Nursery will create further flooding issues both for the new developments and existing properties. The lessons of developments on flood plains should be learnt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- Local roads are already overwhelmed by rush hour traffic; in the north of the borough in particular the current traffic volumes on commuter routes which are often country lanes are creating long queues through village centres such as Ripley and Send, impacting on the quality of life including the exposure to harmful levels of vehicle emissions.

- Rail services into London where many of the new residents are likely to work are already at or above capacity. The fast services from Woking will be chosen by many commuters living in the new properties planned for
Wisley site A35, Garlick’s Arch A43 and those to the east of the A3. This will cause further traffic issues through the villages en-route to Woking.

- Bus services are currently inadequate, slow, declining in number and due in part to the traffic issues above are totally unsuitable to be promoted as an alternative for commuters in the villages outside of Guildford.
- Active travel in the villages will in the main be cycling, this is not an attractive alternative due to the narrow country lanes which cyclists would need to travel on en-route to local stations. Currently cyclists on these commuter routes increase congestion as it is not possible for cars and commercial vehicles to safely overtake them; unless proper provision is created then this is not a sustainable alternative.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16316  Respondent: 11058817 / Janet E Sims  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- Impact on wildlife in the Wey floodplain and SSSI’s such as adjacent to site A35 the land at the former Wisley Airfield is likely to be severe, there is a rich diversity of wildlife in the area which will be threatened by development on this scale.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7538  Respondent: 11058913 / Tarn Stroud  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT ALSO TO POLICY A35 (WISLEY AIRFIELD):

Once again, there have been no exceptional circumstances presented for development on the Green Belt. Development of the site would contribute to the encroachment of the London urban area into the countryside. Additionally, the area is not a brown field site as stated, only 15% of it is brown field, and the majority of the land is agricultural land.

The development is close to the A3 and M25, and will contribute to unacceptable air pollution levels and an aggravation in traffic jams at A3 roundabout and M25 Junction 10. There is no existing public transport and so car transport will be
required for everyone on the development with access either from the A3 via the junction with the M25 or from to inadequate narrow lanes. No proper traffic data has been provided.

The housing density is far too great, with over 2,000 houses that will swamp and destroy the Ockham conservation area. The development would have a major impact on neighbouring villages, especially Horsleys. No assessment has been made of collective impact on area of this and 6 Horsley sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7537  Respondent: 11058913 / Tarn Stroud  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A40

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT ESPECIALLY TO POLICY A40:

This land is currently Green Belt land used for agriculture and should not be used for housing development. In addition, part of the land is a level 3 flood risk and Ockham Road North, to the east of the development is frequently awash with flowing water following heavy rain.

The winter stream flowing west to east along the southern end of Heatherdene and the school playing field as yet does not overflow in times of heavy rain. However, this stream is not shown in current Environment Agency maps used for planning drainage requirements.

Water seepage, pooling and flooding on Ockham Road North to the north of the railway bridge in East Horsley regularly poses a great hazard to pedestrians due to splashing from cars, coaches and lorries. As the road is not very wide, and pedestrian pavement is only on one side of the road, vehicles often pass very close to the pedestrian making the splashing hazard not just unpleasant but also dangerous, particularly for children. In winter, this stretch of Ockham Road North and the pedestrian pavement are often covered in black ice, even after dry weather, due to the water seepage onto the road and pavement.

This underlying geology of the area is an impermeable layer of clay only about one meter beneath the surface. The Local Plan provides no protection for the existing residents of Heatherdene and Ockham Road North that areas that do not currently flood will not become prone to flooding as a result of development on the adjacent site.

Safe access and egress at Site A40 unachievable, owing to the regular flooding of Ockham Road North to the north of the railway bridge and poor sight lines, narrow access to existing properties and inadequate pavements for elderly and schoolchildren.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16792  Respondent: 11058913 / Tarn Stroud  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY H2 (AFFORDABLE HOMES):

The policy will not contribute to homes for local people, as even the ‘affordable homes’ will be too expensive for those local people finding difficulty in affording local properties. The policy should look to provide homes for local people, rather than providing a way for more people to move into the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16789  Respondent: 11058913 / Tarn Stroud  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO ALL POLICIES INVOLVING MOVING THE GREEN BELT BOUNDARIES:

I am opposed to the changes to the Green Belt boundaries. I am opposed to the removal of villages from the Green Belt.

The Local Plan proposes taking a number of villages out of the Green Belt to avoid the restriction on development in the Green Belt. The Government has strongly urged Planning Authorities to follow the National Planning Policy Framework detailed advice when considering whether to permit additional development in the Green Belt. The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. No case for exceptional circumstances has been made in the plan. The Government has made it clear that unmet housing need is not an exceptional circumstance in law.

I OBJECT TO ALL POLICIES INVOLVING BUILDING IN THE GREEN BELT:

The National Planning Policy Framework (NPPF) states the purposes of the green belt are to check the unrestricted sprawl of large built-up areas, prevent neighbouring towns from merging into one another, assist in safeguarding the countryside from encroachment, preserve the setting and special character of historic towns and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. This Local Plan goes against the stated purposes of the green belt.

The Local Plan allows for several large developments along the route of the A3, from Guildford to the outskirts of London, creating a corridor of development between the two – and so does not prevent the unrestricted sprawl of the London urban area into the countryside.

The Local Plan aims to remove a number of villages from the green belt, thus removing restrictions on development within and around the villages – however, the stated purpose of the green belt is prevent urban sprawl by keeping land...
permanently open, and consequently the most important attribute of green belts is their openness. Also, the location of the land designated as green belt is fundamental to its purpose – designating alternative land that is located in a more developed area further away from London that is of less interest to developers is not protecting the green belt at all.

The Local Plan permits a disproportionately large amount of development in areas that are currently Green Belt, whilst a relatively small amount of development is planned for the existing urban land. The proportion of new housing within Guildford is far too small, with the development planned for the countryside, ruining the latter and harming urban regeneration. This goes against the aim that urban regeneration is encouraged.

Our ancestors had the foresight to create the Metropolitan Green Belt to restrict the outward growth of London. We must protect this for our descendents.

I OBJECT ESPECIALLY TO 6 POLICIES: A36, A37, A38, A39, A40 & A41:

I am opposed to the changes to the settlement boundaries for East and West Horsley. I am opposed to the removal of East and West Horsley from the Green Belt.

The proposed changes to the settlement boundaries for East Horsley and the northern part of West Horsley may result in considerable development within the new boundary in addition to the development proposed in the plan. There is no assessment of the level of additional, as yet unplanned, development that this change may have.

The plan indicates that it is assumed that some of the development in East and West Horsley will be within walking distance of the primary school and the railway station. However, the pedestrian pavements within East and West Horsley are frequently on only one side of the road and often narrow due to encroachment of trees and hedges. The roads often flood or have large puddles making walking along pavements hazardous after heavy rain. The roads and pedestrian pavements are also often poorly lit or not lit at all. This infrastructure would have to be dramatically improved to avoid significant increase in car traffic - but to do this would completely change the character of the villages to be more like an urban area.

The public transport facilities in East and West Horsley consist of a good train service but an infrequent bus service that does not run in line with typical working hours. It is likely that most of the additional transport resulting from the development in East and West Horsley will result in additional car journeys - either directly to the destination or to and from the railway station. The assumption of pedestrian access to the facilities is incorrect.

The proposed amount of new housing far exceeds the local need. The proposed developments would bring a disproportionately large number of new residents to West Horsley, in particular, for whom there a few opportunities for local employment. The employment prospects for these new residents would mostly be outside of the Horsleys. Hence the new developments would be not be providing for local needs, but would allow for people to move out of London and but still commute into London for their employment. This is not a sustainable development and goes against the purposes of the green belt.

The infrastructure of East and West Horsley cannot support such a great increase in the number of houses. The local plan classifies Station Parade in East Horsley as a District Centre, designating it an area appropriate for large development due to the availability of local facilities. There is no assessment of the facilities themselves and whether they could support the proposed development sustainably. The 'supermarket' in East Horsley is not sufficiently large to be subject to Sunday trading restrictions, and as such would not fall into a modern description of a supermarket. The small parades of shops in East and West Horsley can only be described as local shops. However, once again, to develop these areas to provide the additional facilities to support a far greater population would completely change the character of the villages, a result which goes completely against the purpose of the Green Belt.

The proposed housing density is excessive when compared with existing housing density within the Horsleys and would transform the Horsleys into a sizable town, something for which no case is made and for which there is no local support. The collective impact of these 6 sites on a small part of the borough is not considered by the Local Plan and they should not be treated as isolated, separate sites. The total amount of new building in the northern part of West Horsley and the adjoining part of East Horsley is out of scale with the planned development elsewhere the borough, including the less sensitive urban areas that are not protected by the Green Belt.
The Horsleys are characterised by streets with development along only one side of the road and an attribute of openness. The policies allow too many adjacent green fields to be developed. This goes against the stated purpose of the Green Belt to retain attractive landscapes and the enhancement of landscapes, near to where people live.

The development sites are mostly currently used for agricultural purposes. To use agricultural land for development purposes cannot be considered ‘sustainable’. Also, the key infrastructure is lacking, with poor wastewater capacity and flooding.

The development of the Horsleys would contribute to a significant narrowing of the Green Belt gap with neighbouring settlements hugely narrowed, especially if the neighbouring large developments also occur at Wisley Airfield, Burnt Common and Gosden Hill Farm.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16790  Respondent: 11058913 / Tarn Stroud  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY S1 (SUSTAINABLE DEVELOPMENT):
There is no mention or commitment to protecting the Green Belt. The Green Belt is one of the most important aspects of sustainable development around London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16791  Respondent: 11058913 / Tarn Stroud  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY S2 (BOROUGH-WIDE STRATEGY):
The annual housing targets are far in excess of what is required for the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/17086</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the designation of Station Parade as a 'District Centre' - This results from a misreading of the nature East and West Horsley, Effingham and Ockham as linked but separate communities and a misreading of the nature of the facilities in each community. The new designation would inappropriately focus new commercial development in the 'District Centre'.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am concerned about the impact this will have on Traffic - The Horsleys are semi-rural, spring-line villages with rural road systems dating back to 14th Century property boundaries - just after the Black Death. The roads are narrow, winding and flood regularly. Assuming that every new house has at least 2 cars, this means potentially more 1100 more cars within the villages, and 6000 new vehicles within a three mile radius of the villages. New residents of Wisley, Ockham and Ripley will need to travel into the middle of East Horsley or to Effingham for train connections. The impact of this increase in traffic on our local road infrastructure will be unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am concerned about the impact this will have on our Schools - Local primary schools are already at capacity and, if news reports are to be believed, there will be a severe shortage of places over the coming decade, even before there is any new development. Only three years ago, pupils from Horsley were told that there were no places for them at the local senior school so special provision had to be made. According to the new plan, despite the large increase in the number of households, no extra school places are planned in the Horsleys. Where are the children of these households supposed to go to school? The primary school places proposed at Wisley Airfield will not be available until years into the project and, as yet, there is no plan for a new secondary school.

I am concerned about the impact this will have on our Medical facilities - We have a very good medical centre where it is, unfortunately, not unusual to have to wait three weeks to see a named GP. The addition of 500+ new households will only exacerbate this problem.

I have already stated that I do not object to development in itself but the current proposals are out of all proportion to the current communities.

Implementation of these proposals would irrevocably alter the nature of the communities.

Implementation of these proposals would overburden the community infrastructure.

Implementation of these proposals would not address the real areas of housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17085  Respondent: 11060065 / Meredith Hopkins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removing of the Horsleys from the Green Belt and the extension of the boundaries of the settlement areas - What are the 'exceptional circumstances' which warranted these? Why are the Kingston Meadows, the only truly open community area in the Horsleys, included now in the settlement area?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17088  Respondent: 11060065 / Meredith Hopkins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am concerned about the impact this will have on Flooding - The site behind Ockham Road North in East Horsley is partially a level 3 flood risk area, and local residents are well aware of how much standing water there is on their properties after rain. Building on such land will only exacerbate the problem. Already, local roads are regularly flooded when it rains, no matter how much ongoing work is done on drainage ditches.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17084  Respondent: 11060065 / Meredith Hopkins  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Having written to voice my concerns and objections, as an East Horsley resident, during the 2014 consultation period, I now write to express my concerns about the new Guildford Local Plan, particularly as it relates to the Horsleys, Effingham, Ockham and Wisley. I am not opposed to housing development, per se, and, as I live on a council estate, I am not driven by concern about a reduction in the value of my property. I am, however, concerned that, despite the undoubted time and money that has been spent on consultation and map work, the proposals lack coherence and seem to have been driven by an arbitrary mathematical model of projected housing need in Guildford Borough which is well in excess of the official national estimates for local population growth. The proposed scale of housing increase is out of all proportion to the character of these villages. In addition, the proposals also do not seem to cater for a mixed population which, given that it is the youngest and the poorest in our society who have the greatest need of accommodation, calls into question the drive to build so many new, large and very expensive properties unless it is just for profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3885  Respondent: 11060161 / Sean McGuire  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A39

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
In particular, site A39: Land behind Ockham Road North, near Horsley railway station

I wish to make it clear that I have read and fully support all of East Horsley Parish Council’s comments on the draft plan. I have not repeated them here, but please take that as understood.

I wish to take particular note of plans to build in section A39. My comments are as follows

1) This is land designated as Green Belt and it is not clear to me that a redesignation is permissible under the reasons given in the local plan

2) There is and can only be limited access to the site and any further access will require new road junctions onto Ockham Road North which at certain times of day is already heavily congested

3) There is already a severe problem with drainage in the area and the plot in question regularly floods. The Environment Agency have recorded this risk. Adding residential property to this site will only exacerbate these problems and place both any new dwellings and those existing buildings in the area at greater risk of flooding. This risk does not appear to have been considered in any of the assessments and should at the very least necessitate a pause while the appropriate survey work is conducted.

4) The borough council have already proved themselves to be incapable of maintaining the sewerage systems to a standard that can deal with the level of rainwater run off currently required. Ockham Road North regularly floods. There is no evidence to suggest that this will be any better in future and additional housing stock will only make it worse

5) There is no evidence of demand for this type of housing in the area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
As a local resident I object to the 533 houses being proposed.

The impact on both West and East Horsley does not seem to have been considered or at least any plans put in place to handle the additional population.

The station car park is already full every day – where will the additional cars park? There is no space for the car park to be extended.

As mentioned above, the roads are already very busy, particularly with speeding drivers. This will get worse, particularly with the rush to get a parking space.

The medical centre is brilliantly run but how can they be expected to cope with an additional 533 families? What plans are in place to deal with this?

If the other large developments are allowed also such as Wisely airfield, this will have the same impact on the Horsleys.

As I have said before, I am not an expert and cannot comment on the planning policy but it seems to me that there must be other more sensible options that wouldn’t cause such a huge feeling of betrayal by Guildford Borough Council. Surely smaller numbers of houses on the plots and not removing the Horsley from the Green Belt would have been a better option. There must be other brown field sites elsewhere which would be better and not in the Green Belt. And the house prices are so inflated in the Horsleys that the intended purchasers will never be able to afford them anyway.

I hope my comments will be taken into consideration

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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I live on Ockham Road North in East Horsley in front of the proposed siting of the 100 houses – A39.

I object to this site for numerous reasons. Firstly the field is an enormous flood plain which is either saturated with water or bone-dry and cracked – due to the soil constituents being mostly clay. Our garden is exactly the same. Every time it rains, the water creeps up the garden and threatens to flood our house and my neighbours’ houses. This is also aggravated by the run off from the railway line.
If any houses are built on the site, where will this water go? Our houses will flood for sure. Given the size of the site, how can any flood measures guarantee to handle all the water from 5.7 acres? The small stream between our garden and the site will not be able to handle it all.

Further when it rains the drains running from our houses out to the road are incapacitated and do not allow water to drain so that water comes back up into the house. This has happened this summer and so can only become worse in the winter. With the climate changing in the UK with less frequent but greater downfalls, this can only add to the impact. Adding more pressure to the drainage network is not acceptable. Are the developers prepared to fully indemnify every householder on Ockham Road North for the cost of moving and the loss of value of their house if the flood measures were ineffective?

Demolishing the 2 houses next door but one to us will also result in huge noise pollution as residents from this site drive in and out. We live in East Horsley because it is a quiet village and in the Green Belt. To have an additional 100 houses behind us will change the nature and character of the village.

It should also be noted that, in the mornings and evenings, it is virtually impossible to pull out of our drive. How much worse will it be when there are potentially another 100 cars trying to pull out or turn in at those times?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I strongly object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough (Appendix D) and to the lack of transparency in the evidence for this Plan.

The proposed Plan’s housing growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans. It also seems to be much higher than in any other borough in Surrey, which is amazing. How did this report come to this figure which affects Guildford so much more than any other borough?

Why will the Council not publish the SHMA report? This figure cannot be verified nor discussed as part of the consultation. Was there a Brexit analysis within the report – if so what did it say? There should be a new report and any Plan put on hold until we have a revised analysis (which should also be made public).

This utter lack of transparency (along with the lack of consultation etc. as mentioned previously) is not right and makes for very poor consultation with respect to the proposed Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6731  Respondent: 11061185 / Peter Komisarczuk  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43) Garlick’s Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for it to be removal from the Green Belt (Policy P2). Central Government states clearly that housing need is not an exceptional circumstance.

The Plan states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch. No consultation took place on this, and GBC’s Green Belt & Countryside Report does not even cover Garlick’s Arch. I am appalled that we were not consulted; this is surely inappropriate behavior by GBC. There were reports in the local paper about the meeting at which this proposed Plan was so called “debated” which showed utter contempt by GBC for due process, for considered debate and the gagging of dissenters. This is not good government nor does it appear democratic.

As has been said, no doubt in thousands of objections, the site is not appropriate because:
- There is no sustainable transport infrastructure.
- The site is liable to flooding
- The site has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.
- There are no plans to improve local schools, medical or utilities to cope with the proposed development.

As previously stated your assumptions need to be looked at again in light of Brexit as well as all these aspects noted above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPS16/6730</th>
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<td>I strongly object to the inclusion of the land for new on/off ramps at Burnt Common (A43a) North facing ramps to the A3 at Burnt Common would be a disaster for us local residents, access the A3 to the north might be nice to have for some people who are likely to be passing through. The on/off ramp addition will simply draw in a huge amount of ‘through’ traffic. E.g. all traffic from London/M25 to Woking would go through Burnt Common, Send and Old Woking. This is not sustainable as this route cannot be improved. I noted in 3 above, that I have not seen any modeling on this, but it is common sense that this will just make congestion worse. If GBC insists on such huge changes taking place then they MUST undertake proper analysis AND consultation AND rigerous scrutiny of the proposed Plan.</td>
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<td>I strongly object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3) We live close to Garlick’s Arch (A43) and this proposal would double the built area in the locality. I strongly believe that it would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees. I have noted that access to the fields have been restricted recently – a truck deposited a whole pile of soil at the access to the left of Burnt Common Lane back in June. I don’t know if there was right of way at this point of access, but it has been there as an established point of entry for a very long time. Obviously there is going to be ill will generated and I am deeply saddened by this turn of affairs.</td>
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I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning. In addition there was discussion of more at Slyfield rather than around Burnt Common.

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for here decades employing local people and are therefore clearly sustainable. If this plan were to go ahead would the GBC sufficiently help these businesses to move into suitable local alternatives?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I strongly object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

There is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that other than a slip road onto the A3 at Burnt Common – to which I object as it will attract more traffic to this area and cause more congestion (although it might reduce traffic going through Ripley towards the A3 junction at Wisley. You are simply moving the problem around not fixing it.

The rural roads in this area are often very narrow, in poor condition and often have no footpaths. It is madness to risk pedestrians lives or health with all these new homes – I believe it means dangerous and unsustainable traffic. I have not seen detailed modelling of the affect of this development on the road infrastructure - how can you proceed without sufficient systematic and scientific evidence and good modelling going through the entire development plan and through to 5 years after completion?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

| Comment ID: PSLPP16/14253  Respondent: 11061185 / Peter Komisarczuk  Agent: |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the lack of proper infrastructure planning for sites (Policy I1)

The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough. Surely someone must have considered that this might be necessary and should therefore be in the Plan?

I have previously objected to the proposed development at Wisley and this new Plan does not address the issues raised.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14254  Respondent: 11061185 / Peter Komisarczuk  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object due to the congestion that these developments will most likely cause to the trunk roads, A3/M25 (Policy I2)

I believe the A3 and/or the M25 would have to be improved before any development is done. We are advised that Highways England has no plans to even start considering improving the A3 before 2020.

I am a user of the A3 and M25 and it is often very congested and already typically adds between 15 to 30 minutes of delay at peak times to my commute. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should therefore not take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14250  Respondent: 11061185 / Peter Komisarczuk  Agent:
I strongly object due to poor air quality concerns and noise pollution levels (Policy I3)

The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

In addition to air quality the proposed previous development in the fields adjacent to Garlicks Arch noted that the levels of noise from the A3 were high and this would lead to poor quality of life for the new residents. We live on the opposite side of Burnt Common Close – so further from the A3 – and we certainly find the traffic noise can be tiresome, especially in winter when there is less deadening of the noise and the wind direction can carry noise from the A3. Adding the on/off ramp will make air quality poorer and add more noise because there will be more traffic on all roads around this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I strongly object to development in areas which are at risk of flooding (Policy P4).

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times and people have identified that under your own assessment criteria Garlicks Arch is not good enough to be included in the plan. I have seen some of the flooding around Burnt Common/Garlicks Arch and it would need to be dealt with IF this Plan were to go ahead, which I sincerely hope it will not.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I strongly object to the Local Plan as the development proposed is not sustainable (Policy S1).

The nearly 14,000 new houses proposed cannot be sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The road infrastructure is not great in these areas, there are issues with parking, often traffic jams etc. Also Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car, in our own Burnt Common close some homes have 4 or 5 cars which causes parking issues. The proposed Plan has nothing to improve the infrastructure for Garlick's Arch, which has had issues of flooding as well as its poor access, but even if the Plan did have some infrastructure improvements I would still object for some of the reasons 2 to 13 below.
I believe the development should be in more urban areas where there is a more sustainable transport infrastructure.

Furthermore I am sceptical of the claimed need for so many new houses and light industrial as we now have the Brexit scenario – likely to have fewer immigrants (and Politian’s claiming those EU citizens here may be sent back to their home countries) and we have already seen an issue with business confidence and with the likelihood of a recession looming, I believe that GBC need to revisit the assumptions under which they have proposed this Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14248 Respondent: 11061185 / Peter Komisarczuk Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey. Why do you need to buck the trend?

The proposed Plan is unbalanced across the borough; there is a lot of development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]).

That is 36% of all the proposed Plan’s new housing proposed within this area, which has only 11% of the existing housing. Is this because the members of GBC do not live in these areas (as has been reported) and so are biased in their decisions?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/639 Respondent: 11061185 / Peter Komisarczuk Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send Marsh/ Burnt Common

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I write to strongly object to the Guildford Borough proposed local plan (June 2017). The plan seems to have many flaws and affects the north east area of the borough disproportionally and is based on developing many areas of Green Belt land without proven “exceptional circumstances” as required by the National Planning Policy.

The proposed local plan puts almost 41% of housing development into about 10% of the borough, centred around Send Marsh. In addition there are also developments of warehouse/industry capacity, a travelling show people site and a waste management facility in the same area. The use of Green Belt land has been prioritised over Brownfield options (I note A34 and A44 for example and the change of use of A4 from homes to provide more retail facilities), it is totally unacceptable to use green belt instead of brownfield sites (policy P2, particularly around site A43). I also see the proposed plan as an unfair allocation of development in the north east of the borough that has not been well justified. In addition I object to the lack of local infrastructure planning that has been shown in this proposed plan, particularly around A43 and A42, our villages have not got great road infrastructure, nor lots of capacity in schools, doctors or dentists etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/642  Respondent: 11061185 / Peter Komisarczuk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send Marsh/ Burnt Common

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I summarise the key issues from my perspective as a resident around many of the proposed developments:

• A43, removal of Garlicks Arch from Green Belt. There are no exceptional circumstances as required by the National Planning Policy for this removal. Building circa 650 houses etc. here is not appropriate.

• A43, 6 travelling show people sites in A34 Garlicks Arch, not required as A50 has an allocation of 14 plots. No “need” extra facility at Garlicks Arch.

• Hiding of development by “deferment” (A24, A25, A26, A43). I applaud your strategy of deferring some development beyond the period covered by the plan! This results in some 1,100 additional houses being approved in A24, A25, A26 and up to 650 in A43 for development in the future. This sort of shenanigans is bordering on predatory behaviour by Guildford Borough Council, by targeting the north east of the borough.

• A43 and A58. It is clear that the “required” industrial space should more than adequately be provided in A58 and does not need the development within A43. In addition the “separation issue” previously used should be applied to A43 Garlicks Arch as that includes ancient woodland etc. and so should be preserved.

• A58 – Waste Management Facility. This is mentioned in policy 4.423a. This policy does not allow for full and proper consultation and is an inappropriate inclusion in the proposed plan. This provision of these facilities is highly contentious.

• A4, A34, A44. As mentioned earlier, I object to the removal of brownfield sites, or their redevelopment for retail (we already have a lot of that in the borough), if that results in the removal of some area of the Green Belt.

• Increase in A42 housing proposal. The proposal is to increase by a further 1/3rd which will impact the road infrastructure further. It is already pretty bad, with tiny lanes that are unsuitable for large numbers of additional cars, let alone construction traffic and there is no proposal in the plan to improve the infrastructure. I presume it is too expensive and would reduce the profits of the developers (in line with your new policy).

• Removal of Send Business Park from the Green Belt. Why? Its some small businesses – what are the “exceptional circumstances” as required to make this change?

• Lack of infrastructure improvement within the proposal – basically there is no analysis and no proposal to improve the infrastructure, which is unacceptable. This needs to be investigated and agreed before the proposed plan can be
implemented. I am sure I have missed many other aspects in the proposed plan, however I hope that this objection will have a positive impact on the proposed plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2547  Respondent: 11061185 / Peter Komisarczuk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy 4.2.23, affordable housing. I note that you have clearly sided with the developers – that the developers can pay you off and avoid building affordable homes at all. How does this help young families in the borough? Are you going to use the pay off to build the affordable houses that the developers will not?

Clearly not as that is not in the proposed plan! Perhaps the pay off is not large enough, because it optimises the profit for the developers and does not allow you to commission equivalent affordable housing within the borough.

• Removal of section 4.2.40 from the proposed local plan shows that you are willing to provide developers with the opportunity to make more money from their developments.

• This is an unacceptable policy from local government – clearly we simply don’t count and you wish big business to prosper further. At least you are now being open in your desire to build big business profits at the expense of our environment and us.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/435  Respondent: 11061345 / Ewbank's Organisation  Agent: DMH Stallard LLP (Geoff Smith)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We act on behalf of Ewbank’s, and attach our Submissions on the ‘Proposed Submission Local Plan: Strategy and Sites’ (June 2016) for your consideration.

Our objections relate to the omission of the Land around Burnt Common Warehouse as a development site, and propose that it be re-instated in Policy A43 for approximately 100 homes (C3), and at least 7,000 square metres of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8).

1. Introduction

1.1 DMH Stallard act on behalf of ‘Ewbanks’, on planning matters in relation to the Ewbank’s Burnt Common Auction Rooms site, which is located to the south of the settlement of Send Marsh/Burnt Common.

1.2 These representations relate to the Guildford Borough Proposed Submission Local Plan: Strategy and Sites 2016, which covers the period 2018 to 2033.

1.3 Our representations focus on objecting to the proposed removal of the allocation of Land around Burnt Common Warehouse, London Road, Send, for employment and residential purposes. This allocation comprised employment uses of either (or a mix of) light industrial (use class B1(c)); general industrial (B2); and storage and distribution (B8).

1.4 This site allocation was not only in the Draft Local Plan (2014) (Site 74), but also in the Draft Version of the Proposed Submission Local Plan considered by the Guildford Borough’s Economy and Infrastructure Executive Advisory Board on 13 April 2016, and in the papers for the meeting of the Borough Council’s Executive Committee. The Report to the Executive stated:-

“Send Marsh/Burnt Common – this site is located in a yellow (medium) sensitivity land parcel. Our Employment Land Needs Assessment identifies a need for industrial land and this site is the only suitable and deliverable site identified by the Green Belt and Countryside Study that could meet this need”.

1.5 We were therefore astonished that a Supplementary Information Sheet was presented to the Executive Meeting on 11 May 2016 which proposed to remove this site from the Local Plan, and replace it with a site at Garlick’s Arch, with an increased housing allocation from 100 homes to 400 homes, as well as up to 7,000 square metres of employment.

1.6 Our objections focus primarily on the reasons given in this Supplementary Information Sheet, which we submit are not drawn from any of the ‘evidence base’ documentation which has been produced throughout the preparation of the Local Plan. The proposed site allocation at Garlick’s Arch should therefore be deleted from the Local Plan, and the Land around Burnt Common Warehouse be reinstated.

1.7 Section 2 of these objections set out reasons why the Land around Burnt Common Warehouse, London Road, Send, should be reinstated as an allocation for employment and housing. Section 3 identifies those Policies in the Proposed Submission Version of the Local Plan which should be amended, and Section 4 sets out the proposed wording of these proposed amendments.

2. Omission Site: Land around Burnt Common Warehouse, London Road, Send

2.1 We submit that this site, which was not only included in the Draft Local Plan in 2014, but also in the draft of the Proposed Submission Local Plan in April 2016, should be reinstated as an allocated site. We submit that the proposed inclusion of land at ‘Garlick’s Arch’ for housing and employment is ‘unsound’ as it is not based on the extensive ‘evidence-base’ for this Local Plan. We will address all of the four reasons for this proposed change, as set out in the Supplementary Information Sheet to the Council’s Executive Committee on 11 May 2016, to demonstrate that these are not ‘sound’ reasons to support the proposed development at Garlick’s Arch. We will then comment on any relevant general policies on the Plan for completeness.

2.2 In the Draft Local Plan 2014 this site was “Site 74” described as being 13.4 hectares in area, with existing uses of storage and distribution (B8) and undeveloped land. It also contains the Ewbank’s Burnt Common Auction Rooms and associated car parking. It was one of the “Land Around Villages” Site Allocations, proposed for:-

“Light
industrial (B1(c)), general industrial (B2), storage and distribution (B8), or Light industrial (B1(c)), general industrial (B2), storage and distribution (B8) and housing (C3)."
The Plan also included this site in Policy 13: Economic Development, as a new strategic employment site, called ‘Land around Burnt Common Warehouse, Send’, and defined on the Guildford Borough Overview Map (Appendix E of the Draft Plan).

2.3 In the Draft Plan 2014, it described this site as follows: “The site contains and surrounds an existing site of three warehouses. Within the site, land to the east of the existing warehouses is suitable for new homes including at least 45% affordable houses. Land to the west of the existing warehouses is suitable for new employment uses (B1c, B2 and B8). If new homes are not provided, the whole of this site is suitable for new employment uses (B1(c), B2 and B8).”

2.4 This same site was also included in the April 2016 Version of the Proposed Submission Local Plan as “Site Allocation A43 – Land around Burnt Common warehouse, London Road, Send”. It proposed: “Homes (C3) (approximately 100) and employment floorspace (B1c, B2, B8)”. In support of this proposed allocation, it states: “Key considerations:— Location of employment uses and houses within the site.— Appropriate green buffer between residential and employment uses.” It is also contained within “Policy E1: Sustainable employment”, where it states: “When developed, the new employment site at Burnt Common will be treated as a Strategic Employment Site”.

2.5 This site was further confirmed in the Report to the Council Executive of 11 May 2016, when it stated that “this site is the only suitable and deliverable site identified by the Green Belt and Countryside Study that could meet this need”).

2.6 In the light of this consistent approach to the proposed allocation of this site in the Draft Plan 2014 and in the April 2016 Version of the Proposed Submission Local Plan, and the extensive evidence base supporting these versions, we were astounded to see that the site has now been deleted from the Plan, in a ‘Supplementary Information Sheet’ to the Council Executive of Wednesday 11 May 2016, and replaced with a totally new site to the east, described as ‘Garlick’s Arch’, Send Marsh/Burnt Common, without in our view any valid explanation.

2.7 The reasons given for this ‘last minute’ change are in our view unconvincing, in that they do not introduce any new evidence for allocating this site which would not have been available to the Council officers when the previous (April) revision of this Proposed Submission Local Plan was prepared. Four reasons were given in this Supplementary Information Sheet, and we comment on these in turn. Reason 1: The new site will provide land to facilitate the provision of on/off access to the A3, which will provide significant improvements to the highway network and is fully supported by Surrey County Council. This has been discussed with Highways England and further technical work will be undertaken to address their initial comments.

2.8 At no stage up to May 2016 has there been any reference to the need for the proposed employment and housing at Land around Burnt Common Warehouse to include a link onto the A3. This includes the draft Proposed Submission Local Plan published less than a month before this executive meeting. The discussions between Guildford Borough Council, Surrey County Council and Highways England must have been taking place over several months, if not longer, and at no time were Ewbank’s contacted to discuss this matter.

2.9 We are further concerned that the Council state that this proposed junction works on the A3/A247 may be required to form part of the wider transport solutions for the proposed New Settlement off the A3 on Land at the former Wisley airfield, Ockham (Site Allocation A35 for 2,000 homes approx.). In the “Transport Topic Paper – June 2016”, one of the accompanying evidence base documents for the Pre-Submission Plan, paragraph 5.52 states: “New north facing junctions to the A3 are also proposed at the A247 Burnt Common interchange. These accesses are referenced as SRN9 ‘A3 northbound on-slip at A247 Clandon Road’ and SRN10 ‘A3 southbound off-slip at A247 Clandon Road’ in the Appendix C Infrastructure Schedule. These junctions are being promoted to mitigate the impact of the level of strategic planned growth and in particular the development traffic flows resulting from the development of a new settlement at the former Wisley airfield site (site allocation Policy A35), as well as limiting any increase in traffic joining and leaving the A3 at the Ockham interchange.”

2.10 We submit that the previously proposed Site Allocation at Land around Burnt Common Warehouse has excellent vehicular access, and there is no reason to delete the site on highway grounds, which appears to have been the case. The Draft Plan stated that this site could be developed in the short term (1 – 5 years), and there was no reference to any transport or access constraints to its immediate development.
2.11 The site has excellent vehicular access onto the London Road (B2215) with ample capacity for the traffic which would be generated from the proposed new development on this site. This must have been recognised by the Borough Council in identifying this site for employment and housing, and there has been no change in circumstances since the publication of the Draft Plan in 2014, or the April 2016 Version of the Proposed Submission Local Plan.

2.12 There are also opportunities for road re-alignments directly adjacent to the Land around Burnt Common Warehouse site, which would improve both the vehicular access into the site itself, and also the overall traffic flows in the immediate vicinity of the site. We would be pleased to engage with Guildford Borough Council, Surrey County Council, and Send Parish Council to discuss these opportunities in detail. **Reason 2: The (new) site location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm, Merrow Lane, Guildford (Site Allocation Policy A25).**

2.13 The proposed site allocation at Gosden Hill Farm was also contained in the Draft Plan, and the Borough Council considered that there was a sufficient separation between the two sites at that time. There has been no change in circumstances since the Draft Plan, and so we consider that any concern relating to the separation distances between these two sites is totally without foundation.

2.14 Both at the Draft and Submission Plan stages of the Local Plan the Gosden Hill Farm site has been proposed for a mix of uses, including 2,000 homes; employment uses; education; local retail centre; community and health services; park and ride; and travellers pitches. The Submission Version (page 180) also proposes that part of the site, adjacent to the A3, will need to remain ‘open’ as a ‘green buffer’, in order to ensure that sufficient separation is maintained between the site and Send Marsh. In the Draft Submission Version (April 2016), both of these sites were being proposed for development, and there was no reference to any concern over the proximity of these two sites. There can therefore be no justification for the statement in the Supplementary Information Sheet in May 2016 that there is a need for ‘greater separation’, and to delete the Land around Burnt Common Warehouse in favour of the Garlick’s Arch site.

2.15 The Green Belt and Countryside Study, a major ‘evidence base’ document for this Plan, also confirmed that there are no concerns over the proximity of these two sites from a ‘separation of settlements’ aspect. Volume 2 (February 2013) and Volume 2 Appendix (April 2014) both identify Gosden Farm/Nuthill Farm as a Potential Development Area (Land Parcels C1 and C2), as well as Land around Burnt Common Warehouse (Land Parcel B13).

2.16 To reinforce our submission that this Green Belt Study did not express any concerns regarding the proximity of these two sites, the Environmental Capacity Analysis of the Land at Burnt Common Site (B13) (Volume 3), confirms that this site is a Potential Development Area, and is:—“Surrounded by defensible boundaries including treebelts following London Road and Clandon Road to the north and east, tree cover following the A3 to the south, and hedgerows near the commercial area to the east of the PDA.” This underlines that the Land at Burnt Common is a well screened self-contained site, and that there is no ‘evidence-base’ justification for removing this site from the Submission Plan on the grounds of needing greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm, Merrow Lane, Guildford (Policy A25). **Reason 3: The Site provides the employment floorspace needed in the plan to help meet identified needs.**

2.17 The Land at Burnt Common, unlike the Garlick’s Arch site, is already an identified employment site. The Draft Plan states:—“The site contains and surrounds an existing site of three warehouses. Within the site land to the west of the existing warehouses is suitable for new employment uses (B1c, B2 and B8)” It also makes reference to the fact that the whole site has potential for new employment uses. It is also significant that the western part already contains the Ewbank’s Auction Rooms and related car parking area. This is therefore an obvious site to retain in the Plan for employment purposes, and no reason is given in the Supplementary Information Sheet for deleting this employment site.

2.18 There will also be a significant adverse impact on the residents of Burnt Common and Send Marsh if the employment allocation is at Garlick’s Arch. All the employment traffic will need to use the existing roads, including the B2215 east of the Burnt Common roundabout, and also through the villages, as there will be no direct access off the A3 from the proposed new A3 junction. No such adverse impact would result from new employment of the Land at Burnt Common, as vehicular accesses already exist from the B2215 London Road.

2.19 It is significant that in allocating the Land at Burnt Common for employment, no concerns were expressed relating to the access arrangements or traffic generation from the site. Therefore there is no reason why this proposed...
allocation for employment should be removed from the Plan. On the contrary, this decision will inevitably result in a
significant adverse impact on the villages in Burnt Common and Send Marsh

2.20 As has been referred to, the Land at Burnt Common is already an established employment site, with
significant buildings and related car parking within the site, well screened from the wider landscape. The Garlick’s Arch
site, in contrast, is a totally greenfield site, with no existing employment, and is also prominent in the landscape. It is
therefore bad planning to introduce new employment development on this land, when there is an obvious alternative on
Land at Burnt Common, which has significant existing employment uses; has substantial built development; and is well
screened.

2.21 The Submission Plan confirms the importance of a healthy economy, and that it is essential to provide new
employment land of the right type, in the right places, and at the right time. The Land at Burnt Common fulfils all of these
aims, and would provide land in the short term, unlike Garlick’s Arch, which would require significant infrastructure works
before the employment land would be available. The proposed new slip-road onto the A3 would not be delivered until the
period 2021 and 2027, as stated in Appendix C of the Submission Plan (Infrastructure Schedule – References SRN9 and
SRN10; A3 northbound and southbound off slips at A247 Clandon Road). The employment land at Garlick’s Arch will not
be developed in the first 10 years of this Plan. Whereas the Land at Burnt Common could be developed immediately.

2.22 The Guildford Borough Employment Land Needs Assessment (September 2015) concludes that there could
be a need of up to 47,000 square metres of office/research and development floorspace, and 5.3 hectares of industrial/
storage land, and that this should be provided through the Plan period 2015 to 2033. The Land at Burnt Common would
provide flexibility to provide new employment throughout this period; especially at the early stages. Garlick’s Arch, in
contrast, would only be able to provide employment land from the mid 2020’s, and is therefore less able to provide the
employment delivery required throughout the period of the Plan.

2.23 In selecting new employment sites in this Plan process, up until May 2016 “Land around Burnt Common
Warehouse” has consistently been included. It was in the Draft Plan – Policy 13/Site 74 (2014), and in the Draft Pre-
Submission Plan – Policy E1 and Site A43 (April 2016). These plans confirm that the site is suitable for employment
development B1c, B2 and B8, either the whole of this site, or in part with the remainder being allocated for housing.

2.24 Even in April 2016, the Executive Report to the Council’s Executive Meeting on 11 May 2016 stated that the
Land around Burnt Common Warehouse Send was the only suitable and deliverable employment site that could meet the
need for a new employment site. It stated in paragraph 4.19:-“Our Employment Land Needs Assessment identifies a need
for industrial land and this site is the only suitable and deliverable site identified by the Green Belt and Countryside Study
that could meet this need”.

2.25 Despite this support for the Land around Burnt Common Warehouse for new employment in April 2016, no
mention whatsoever is made of this site in the Council’s Employment Topic Paper June 2016, the ‘evidence base’ for
employment allocations despite the consistent support for this site throughout the Plan making process. Instead, there is
only a reference to Land at Garlick’s Arch for 7,000 square metres of a mix of light industrial (B1(c)), general industrial
(B2), and storage and distribution (B8). We submit that this site selection is contrary to the Council’s own site selection
process for new employment sites up to April 2016, and as such is a ‘flawed’ allocation, and should be deleted, and the
employment allocation on Land around Burnt Common Warehouse should be re-instated.Reason 4: The site has
additional capacity for residential development and can provide these homes in the early period of the plan,
assisting with meeting the backlog accrued as early as possible in the plan period.

2.26 The Draft Proposed Submission Local Plan (April 2016) proposed 100 homes on Land around Burnt
Common Warehouses as well as the proposed new employment. This proposed allocation was made in accordance with
the significant evidence-base in site selection for Potential Development Areas in the Guildford Borough Green Belt and
Countryside Study.

2.27 The reason for the proposed change from allocating this site to proposing to allocate 400 new homes on Land
at Garlick’s Arch, is not drawn from the ‘evidence base’, and is therefore flawed. It is not identified in the Green Belt and
Countryside Study as a Potential Development Area when assessing the Land around Send Marsh/Burnt Common for
potential development.
2.28 Our concern over this change in allocation not only relates to the lack of an “evidence base” to support the proposed allocation, but also the proposed scale of new housing in relation to the size of Send Marsh/Burnt Common. The proposed development of 400 new homes at Garlick’s Arch would be totally out of scale with the existing community, and would result in a population increase in the order of 1000 new residents. This would increase the existing population of Send Marsh and Burnt Common, which is currently 1,931 by approximately 50% (Green Belt and Countryside Study Volume 5 “Send Marsh and Burnt Common – Major Village Expansion”). This would not only be out of scale with the existing community, but would also place unacceptable pressure on existing facilities and services, such as the local primary school; nursery; and medical centre.

2.29 Serious concerns over the proposed scale of new housing which would result from the development of 400 new homes at Garlick’s Arch were strongly expressed by local residents at the ‘Local Plan Awareness Meeting’ held at the Lancaster Hall, Send on 14 June 2016. Strong objections were expressed both on the location and the scale of the proposed new housing at Garlick’s Arch.

2.30 This proposed scale of new housing at Garlick’s Arch would also cause significant traffic congestion in Send Marsh/Burnt Common. Much of the new traffic would travel north through the village to Woking, along the A247. The present A247 junction at Old Working, immediately north of the village, is already over-capacity during the rush hour, with significant "tailbacks". This would be accentuated with this additional traffic, resulting in unacceptable traffic delays.

2.31 As well as the issue of “scale”, The Council’s “evidence base” also concludes that the Garlick’s Arch site is less sustainable as a housing site than Land around Burnt Common Warehouse. This is set out clearly in Volume 5 of the Green Belt and Countryside Study (April 2014).

2.32 It is important to note that the only reason that Garlick’s Arch was considered for development (in Volume 5 of the Green Belt and Countryside Study) was that at that time a policy option being considered was to identify major village expansions “Potential Major Development Areas”. This policy option has not been incorporated into the Proposed Submission Local Plan, as Table 1 of the Plan only makes reference to “village extensions”, which is consistent with the allocation of Land around Burnt Common Warehouse.

2.33 In the consideration of the sustainability of both the Land around Burnt Common Warehouse and Garlick’s Arch, the sustainability ranking for Land around Burnt Common Warehouse was higher than the Garlick’s Arch site. The higher ranking of Land around Burnt Common related to:

- walking distance to nearest primary school
- walking distances to the nearest local centre/village shop/post office
- walking distance to nearest healthcare facility
- walking distance to nearest railway station
- average walking distance to nearest recreation facility
- walking distance to the nearest Accessible Natural and Semi-Natural Greenspace walking distance to the nearest community/village hall

2.34 As well as Garlick’s Arch not being as sustainable a site as Land around Burnt Common Warehouse, it also has significant environmental constraints. It contains three substantial areas of Ancient Woodland, including Garlick’s Arch Copse in the northern and western parts of the site, and Oldlands Copse on the eastern part of the site. Development on this site will inevitably increase the risk of these important areas of woodland being adversely affected.

2.35 Garlick’s Arch site is also prominent in the landscape. The land is currently farmland, and slopes away to the south, and as such is very exposed to long distant views and also from the A3 which borders the southern boundary of the site. In contrast, the Land around Burnt Common Warehouse is contained in the landscape, with strong natural boundaries, and is also a site which already contains significant development, including warehouses, offices, the Ewbank Auction Rooms, and related car parking and infrastructure.

2.36 The central part of the Garlick’s Arch site is also designated as a flood risk area, and totally unsuitable for built development, either housing or employment. The whole site is therefore unsuitable to allocate for housing and employment, as it has the obvious characteristics of the countryside, including agriculture, characteristics which are clearly identified in the Environmental Capacity Study (Volume 3 of the Guildford Borough Green Belt and Countryside Study –
Section 10 and 11). In contrast, the development of the Land around Burnt Common Warehouse would not result in the loss of any good agricultural land, and has capacity to accommodate new development, including employment and housing, as is identified as such in the Green Belt Study.

2.37 In the light of all this evidence, we submit that no justification has been given to replace the proposed housing at Land around Burnt Common Warehouse with Land at Garlick’s Arch. There is no necessity to create new slip-lanes onto the A3, as the Land around Burnt Common Warehouse is more than capable of being developed for housing and employment using the existing road infrastructure. In contrast, the proposed new slip-lanes would inevitably and unnecessarily generate more traffic in Burnt Common/Send Marsh, as the Borough Council state that these new slip roads would be used by existing (and future) users of the Ockham interchange. This level of traffic will therefore increase significantly, due to the increased traffic generated by proposed new development along the A3 especially the proposed development at the former Wisley airfield site.

2.38 We therefore submit that the Garlick’s Arch site should be deleted, and the Land around Burnt Common Warehouse be reinstated. It is not only a more sustainable site more in scale with the existing village, but the whole site has the flexibility to either be developed for a mix of housing and employment, or alternatively to be developed for employment in its entirety. This was put forward in the Draft Version of the Proposed Submission Local Plan in April 2016, and should be reinstated in the Plan, and the Garlick’s Arch site deleted in its entirety.


Strategic Policies

3.1 We support the stated need to provide some of the housing requirement in the Borough as Village Extensions. However, any housing allocation needs to be proportionate to the size of the village. We submit that the proposal to allocate 400 new homes at Garlick’s Arch is disproportionate in scale to the existing village, and will increase the population by approximately 50%. It should therefore be deleted, and the housing allocation of 100 new homes on Land around Burnt Common Warehouse be reinstated.

3.2 We support Policy S2 which proposes between 4.7 and 5.3 hectares of industrial employment land (B1(c), B2 and B8). We submit that Land around Burnt Common Warehouse is the most suitable location for such uses, a view consistent with the Borough Council’s own view up to May 2016. We object to the proposed employment at Garlick’s Arch, and submit that the significant “evidence base” which has been published by the Borough Council does not support this proposed allocation, and is therefore “unsound”.

Protecting Policies

3.3 We support the identification of settlement boundaries for those villages that are of a scale and form that enable a boundary to be established with a degree of certainty (para 4.3.25). However, any proposed village extensions, such as at Send Marsh/Burnt Common, should be proportionate in scale with the existing village. We object to the proposed Garlick’s Arch extension of Send Marsh/Burnt Common as it is not only a site which is not supported for development on the Plan’s evidence base, but also is out of scale with the size of the existing village, and would almost double the existing population.

Employment Policies

3.4 We support the proposed requirement for additional land (B1c, B2 and B8) of between 4.7 hectares and 5.3 hectares. We further support the statement in the Policy that there is a need to ensure that there is an adequate supply of employment land over the Plan period.

3.5 We object to the deletion of Land around Burnt Common Warehouse, Send Marsh/Burnt Common as a new Strategic Employment Site, and its replacement by land at Garlick’s Arch. The land at Garlick’s Arch is not supported by any “evidence-base” documentation. In addition, this site is dependent on the construction of the newly proposed north facing slip roads to/from the A3 at Send Marsh/Burnt Common. We propose that the wording in the Draft Proposed Submission Local Plan (April 2016) in Policy E1 be reinstated to read:- “When developed, the new employment site on land around Burnt Common Warehouse, London Road, Send, will be treated as a Strategic Employment Site.” This would then make this plan ‘sound’, as the allocation of this site would be consistent with the Council’s “evidence-base,” and with the statement in the Executive Report to the Council’s Executive Meeting on 11 May 2016 on the Land around Burnt Common that:- “this site is the only suitable and deliverable site identified by the Green Belt and Countryside Study that could meet this need.”

Sites
3.6 We object to Site Allocation A43 “Land at Garlick’s Arch, Send Marsh/Burnt Common for 400 homes (C3) and employment floorspace (B1c, B2 and B8). The reasons why this proposed allocation is not ‘sound’ is fully set out in Section 3 of this submission. It is not supported by the Council’s extensive “evidence-base”, and should therefore be deleted.

3.7 This Site Allocation should be replaced by Land around Burnt Common Warehouse, London Road, Send, and included as Policy A43 in the Draft Proposed Submission Version of the Local Plan April 2016. In addition, as the site has the flexibility of being able to accommodate employment uses on the whole site, the wording in the policy should be amended to read “at least 7,000 square metres of either or a mix of light industrial (B1(c)), general industrial (B2) and storage and distribution (B8)”.

4. Recommendations

4.1 We propose that the following changes be made to the Proposed Submission Local Plan to make it sound:-

**Policy A43**

Delete Land at Garlick’s Arch, and replace with the following:-

<table>
<thead>
<tr>
<th>POLICY A43: Land around Burnt Common Warehouse, London Road, Send</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Allocation</strong></td>
</tr>
<tr>
<td><strong>Requirements</strong></td>
</tr>
</tbody>
</table>

**Location** | Village |
| **Ward** | Send |
| **Ownership** | Private |
| **Area (size)** | 13.4 ha |
| **Existing use** | Pastoral farmland and storage and distribution (B8) |

**LAA reference** | Site 152 |

| **Key considerations** | Location of employment uses and housing within the site, residential and employment uses |

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**Policy E1**

Delete the text in this policy which states:-

“When developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common, will be treated as a Strategic Employment Site”.
“When developed, the new employment site on Land around Burnt Common Warehouse, London Road, Send, will be treated as a Strategic Employment Site”.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/3278  **Respondent:** 11061345 / Ewbank's Organisation  **Agent:** DMH Stallard LLP (Geoff Smith)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. Proposed Amendment – Green Belt Boundary (Policy A58)

3.1 This objection relates to Send Marsh/Burnt Common Amendment No. 2. We propose an amendment to the Green Belt boundary to include Policy/Site A58 Land around Burnt Common Warehouse, London Road, Send. Our objection is that this proposed amendment should also exclude the Ewbank’s site from the Green Belt.

3.2 We submit that by not excluding the Ewbank’s site from the Green Belt, this Plan is unsound. It is not ‘positively prepared’, in that it does not meet objectively assessed development requirements, (in this case, insufficient employment land), and its retention in the Green Belt is not “justified”, as it could be excluded from the Green Belt, in accordance with the Borough Council’s own Green Belt and Countryside Studies.

3.3 The Ewbank’s site, together with the Land around Burnt Common Warehouse immediately to the east, was identified as Site 74 for employment development (B1c, B2 and B8) in the Draft Guildford Borough Local Plan 2014. This followed the publication of Volume 3 of the Guildford Borough Green Belt and Countryside Study 2013, which was an ‘evidence base’ document for this Draft Plan. It was therefore considered by Guildford Borough to be suitable to be excluded from the Green Belt at that time, and there have been no changes of circumstances in relation to the Green Belt since that time. Of particular relevance is that this site was described in the Report to the Council Executive of 11 May 2016 para 4.19 in relation to need for industrial land: “the site is the only suitable and deliverable site identified by the Green Belt and Countryside Study that could meet this need.”

3.4 The Borough Council’s Land Availability Study (February 2016) maintained this view. It proposed that the whole of the land around Burnt Common Warehouse, including the Ewbank’s site, an area of 12.75 hectares, be developed for a mix of uses, with the Ewbank’s site, and land adjacent, being suitable for light industrial (B1c), and/or general industrial (B2), and/or storage and distribution (B8). It also made specific reference to retaining the Ewbank’s Auction Rooms use within this overall site. We maintain that as there has been no change in circumstance in relation to the Green Belt in this location, that this whole site should be excluded from the Green Belt, and allocated for employment purposes.

3.5 Ewbank’s Auction Rooms has an urgent need for additional floor space and wishes to remain on this present site given its location, and wishes to continue their expansion. The business commenced in 1990 turnover has grown since they moved here in 1994 by approximately 6 times and employment has risen from 3 to over 30 in the same time. Ewbank’s are Surrey’s leading antique and fine art auctioneers with a saleroom turnover now in the region of £4M. Chris Ewbank is a former chairman and honorary member of the Society of Fine Art Auctioneers and Valuers, former chair of the RICS antiques faculty and a member of RICS governing council, and Founder of the Association of Accredited Auctioneers. The
current Green Belt designation of this site constrains the ability of Ewbank’s Auction Rooms to expand, despite having land and car parking available and it is already a predominantly brownfield site. The current requirement is for an additional 700 square metre building (minimum) to accommodate existing expansion needs.

3.6 In support of excluding this site from the Green Belt, we maintain that its exclusion would not harm any of the ‘Green Belt purposes’, as will be explained in the following paragraphs.

3.7 It would not lead to unrestricted sprawl, as it has well defined boundaries, as confirmed in the Council’s own Land Availability Study 2016. It is enclosed by tree belts along its north western boundary and by hedgerows, treecover, and the A3 trunk road along its southern boundary.

3.8 Its development would not result in neighbouring settlements merging into one another. We strongly refute the statement in the Borough Council’s Employment Topic Paper – June 2017 (para 4.55) that the development of the Ewbank’s site would result in ‘perceived coalescence’. The inference is that there would be a risk of coalescence between the Ewbank’s site and the proposed development at Gosden Hill Farm, Merrow Lane, Guildford to the south west. However, this would not be the case, as the two sites are separated by countryside, and also the A3 dual-carriageway trunk road.

3.9 There would also be no encroachment into the countryside. The Ewbank’s site is predominantly ‘brownfield’, as it not only contains the Ewbank’s Auction Room buildings, but also has hard surfaced car parking for approximately 90 cars. The use of this site for employment purposes would assist in maximising the use of this brownfield site for much needed employment development, in a strategic and sustainable location.

3.10 We submit that this Plan can be made ‘sound’ by the exclusion of the Ewbank’s site from the Green Belt, as shown in Appendix B of these submissions.

4. Proposed Amendment – Designation of Ewbank’s Auction Rooms site as part of Site Allocation A58 – Strategic Employment Site (Policy A58)

4.1 The objection relates to Send Marsh/Burnt Common Amendments Nos. 1 and 3. We propose that the Ewbank’s site be included in this site allocation, described as Land around Burnt Common Warehouse, London Road, Send. Its proposed use is as a strategic employment site, for a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). It is listed in Policy E1(8) (Meeting Employment Needs), and described and defined in Policy Site A58.

4.2 We submit that this Local Plan is unsound, as it does not allocate sufficient employment land to accommodate the potential employment needs to 2034, as set out in our submissions on employment land need in Section 2 of these objections.

4.3 This addition would increase the area of this proposed strategic employment site from 9.26 hectares to 12.75 hectares. It would provide the flexibility for a mix of employment uses, including the provision of small and medium size units. It would also accommodate a new building for Ewbank’s Auction Rooms, and related car parking.

4.4 The inclusion of the Ewbank’s site would make this Plan sound, as it would then be ‘positively prepared’, being more able to respond to employment needs in the Borough for the whole period of the plan in a flexible manner. It would be ‘justified’, as it would provide a strategic employment site in a sustainable location, being within easy reach of the strategic road network. At present its limited size would be less likely to fulfil the employment land needs for the period of the Plan in this part of the Borough.

4.5 The site would also be able to be satisfactorily accommodated within the local road network, as demonstrated in the Transport Report appended to these objections (Appendix D). This Transport Report considers the impact of new employment development at the Ewbank’s site and concludes that the traffic generated from the Ewbank’s site can be satisfactorily accommodated on the local highway network.

4.6 The Transport Report includes traffic surveys carried out in July 2017 at four locations near to the Ewbank’s Site. The increased traffic which is expected to be generated by new employment (including the Ewbank’s site) is estimated. The
Report then concludes that there is sufficient spare capacity on the local highway network, including local junctions, to accommodate the proposed extension of the A58 Site to incorporate the Ewbank’s Auction Rooms site.

4.7 It is also of particular relevance that this comprehensive site is acceptable to Guildford Borough Council in transport terms even without the new A3 slip roads, as it was in the Draft Local Plan in (2014) as a proposed comprehensive development of the Land around Burnt Common Warehouse (including the Ewbank’s site) for a mix of B1(c), B2, B8 and residential development, without the need for new slip roads onto the A3.

4.8 The Borough Council considers that this site is very suitable for development. In its Strategic Land Availability Assessment 2016 it states that there is no known reason why well designed commercial uses in this location, that take account of the amenities of the neighbouring properties, should have an unacceptable impact.

4.9 The key attributes of the Ewbank’s site for employment uses include:-

- It has an existing employment use on the site, comprising the Ewbank’s Auction rooms and car parking for 90 cars;
- It is on a relatively flat, mainly brownfield site;
- It has an excellent vehicular access off the London Road;
- There are no public rights of way across the site;
- It has strong natural boundaries of hedgerows and tree belts;
- It is not subject to views from the wider countryside;
- It is not subject to any statutory or non-statutory landscape, nature conservation, or cultural heritage designations;
- It is in Flood Zone 1, where development is acceptable.

4.10 In the Draft Borough Local Plan 2014, when the Ewbank’s site was included in this strategic employment site (as Site 74) this comprehensive site was described in the ‘Opportunities Commentary’ Section as ‘suitable’ for new employment uses (B1c, B2 and B8). It was considered to be available in the short term (1 – 5 years), and specific reference was made to its identification as being a ‘potential development area – B13’ in the Borough Council’s Green Belt and Countryside Study. This description of the site is an important evidence-base in support of these objections, as there has been no change in circumstances in the suitability of this whole site for strategic employment purposes.

4.11 We therefore submit that this Plan can be made ‘sound’ by the inclusion of the Ewbank’s site as part of Policy A58 land around Burnt Common Warehouse, London Road, Send (Appendix B). This would create a larger and more flexible strategic employment site, with the potential to accommodate a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8).

4.12 We further propose that the allocation of the Ewbank’s site should result in the amendment to the settlement boundary of Send Marsh/Burnt Common, for consistency with the currently proposed strategic employment area. This new boundary would be a natural extension to the settlement, with the defined boundaries of the A3 trunk road and London Road (see Appendix B).

4.13 There is also the additional benefits to the immediate highway adjacent to the Ewbank’s Site. The current access road suffers from significant onstreet parking and is poorly maintained. There would be the opportunity to improve this situation by closing the carriageway along the site edge, which could include incorporating some existing highway land within the whole Ewbank’s site, thus increasing the amount of new employment land in this recognised strategic area for new employment.

5. Conclusions

5.1 We propose that the Ewbank’s site be included within Policy/Site A58 as part of the proposed strategic employment allocation at Land around Burnt Common Warehouse. We submit that the addition of this land will make a significant contribution to the additional land for strategic employment, which we submit is required to provide the flexibility to accommodate strategic employment needs over the period of the Local Plan, to 2034. 5.2 We therefore propose amendment to the following Plans in the Local Plan; all of which are contained in Appendix E of these objections:-

- Send Marsh/Burnt Common – Amendment 1 – Additional Site Allocation A58
- Send Marsh/Burnt Common – Amendment 2 – Green Belt Boundary Amendment
5.3 We also propose that Employment Policy E1(1) be amended to increase the proposed new industrial land (B1c, B2 and B8). This increase should at a minimum, be an additional 3.49 hectares, being the area of the Ewbank’s site.

[See attachments for Appendices]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  
- Appendices A-C.pdf (2.2 MB)
- Appendix D.pdf (3.9 MB)

Comment ID:  pslp171/1562  
Respondent:  11061345 / Ewbank's Organisation  
Agent:  DMH Stallard LLP (Geoff Smith)

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Introduction

1.1 DMH Stallard act on behalf of ‘Ewbanks’, on planning matters in relation to the Ewbank’s Burnt Common Auction Rooms site, which is located to the south of the settlement of Send Marsh/Burnt Common. It is 3.49 hectares (8.62 acres) in area.

1.2 These representations relate to the Proposed Changes to the ‘Guildford Borough Proposed Submission Local Plan: Strategy and Sites June 2016’, which covers the period to 2034.

1.3 Our representations focus on objecting to the exclusion of the Ewbank’s Burnt Common Auction Room site from the proposed new Industrial Strategic Employment Site at Burnt Common (Policy E1(8)).

1.4 In our representations on the ‘Proposed Submission Local Plan : Strategy and Sites – June 2016; we objected to the proposed removal of the allocation of Land around Burnt Common Warehouse for employment uses, (including the Ewbank’s site). We therefore support the re-instatement of most of this allocation through the Proposed Amendment to Policy E1(8) and Site Allocation A58, but strongly object to the exclusion of the Ewbank’s site from this Proposed Amendment.

1.5 The ‘Ewbank’s Site’ has consistently been included as part of this proposed employment site in earlier versions of this Local Plan. It was in the Draft Local Plan (2014) as Site 74, and also in the Draft Version of the Proposed Submission Local Plan considered by the Guildford Borough’s Economy and Infrastructure Executive Board on 13th April 2016, and in the papers for the meeting of the Borough Council’s Executive Committee. The Report to the Executive stated about this whole site:- “Send Marsh/Burnt Common – the site is located in a yellow (medium) sensitivity land parcel. Our Employment Land Needs Assessment identifies a need for industrial land and this site is the only suitable and deliverable site identified by the Green Belt and Countryside Study that could meet this need”.

1.6 In the light of this statement, and in the subsequent decision by the Borough Council to re-instate land at Burnt Common as an Industrial Strategic Employment Site, we can see no reason why the Ewbank’s site is now excluded from this allocation. It forms an integral part of this whole site, and we submit that there are no planning policy reasons for its omission from this proposed allocation.
1.7 The suitability of including the Ewbank’s site in this strategic employment allocation was also underlined in the Guildford Borough’s Land Availability Assessment February 2016, where it stated that this ‘combined site would help towards meeting employment need, and there is no known reason why well designed commercial uses in this location should have any unacceptable impact’. We are therefore very concerned to note that in the 2017 Amendment to this Land Availability Assessment, it states that the Ewbank’s site is now excluded from this employment site, without giving any reasons. It states:-

“The sites boundary has been amended from that previously proposed on the site in the draft Local Plan (2014) to exclude a triangular-shaped parcel of land in the southwest corner and the existing distribution centre”.

There is only a brief reference to this change in the Employment Topic Paper – June 2017 in paragraph 4.55:-

“The site has however been reduced in area to that previously identified in 2014 which addresses the issues related to perceived coalescence”.

This statement clearly contradicts the findings of the Borough Council’s own Green Belt and Countryside Study, which gave no such concerns on coalescence, and considered this whole site suitable for exclusion from the Green Belt.

1.8 In objecting to Policy E1(8) we will be making reference throughout these submissions to the relevant ‘evidence base’ documents. These include:-

- Topic Paper : Employment – June 2017
- Topic Paper : Green Belt and the Countryside – June 2017
- Employment Land Needs Assessment – March 2017
- Guildford Borough Economic Strategy 2013 - 2031
- Guildford Borough Land Availability Assessment – February 2016 and June 2017

We will also be making reference to documents related to these ‘evidence bases’ including the Guildford Green Belt and Countryside Studies.

1.9 In the following Sections we will address the following matters in support of our submission that the “Ewbank’s Site” should be included within the proposed Industrial Strategic Employment Site at Burnt Common:-

- Proposed Amendment : New Employment Floorspace - Policy E1(1)
- Proposed Amendment : Green Belt Boundary – Policy E1(8) and site A58
- Proposed Amendment : New Site Allocation – Policy E1(8) and site A58

1.10 In addressing each of these matters, we will set out why we consider that the relevant Policy is ‘unsound’, and what changes to the Plan are required to make it sound.

2. Proposed Amendment – New Employment Floorspace (Policy E1(1))

2.1 This objection relates to the proposed amendment to Policy E1(1), which proposes changes to the proposed employment floorspace as follows:-

- Reduction in new industrial land (B1(c), B2 and B8):-
  - Lower range from 4.7 hectares to 3.7 hectares
  - Upper range from 5.3 hectares to 4.1 hectares

2.2 We submit that these reductions in new industrial land are unsound, and, rather than reducing the new industrial floorspace, it should be significantly increased. We consider that these current floorspace proposals are unsound, as these estimates are not based on a positively prepared planning strategy which seeks to meet objectively assessed development and infrastructure requirements. Nor is it consistent with national policy, as set out in the National Planning Policy Framework, which seeks to secure economic growth in order to create jobs and prosperity. This is one of the three dimensions of sustainable development, which is seen as the ‘golden thread’ running through plan making.
2.3 This need to provide sufficient employment land for the period of the Local Plan is confirmed in the Guildford Borough Employment Land Needs Assessment - March 2017. In estimating the additional industrial/storage land required in paragraph 7.2.4 of this Assessment, it recognises in paragraph 7.2.5 that:

“Demand for employment land within Guildford could be higher than these and land floorspace forecasts. Employment within the borough has the potential to grow more quickly than currently anticipated, while demand for additional space on the part of businesses already located within the borough could be higher given the extent to which employment densities have risen in recent years”.

2.4 In the light of these comments, the Local Plan should increase these estimates in Policy E1(8), to provide the flexibility to enable an increased amount of employment space to be accommodated in the Borough. This additional employment land should be focussed on identified strategic employment sites. The only strategic employment site east of Guildford town, and within easy reach of the strategic road network is Land around Burnt Common, Send. The addition of the Ewbank’s site would provide an additional 3.49 hectares of strategic employment land, which would provide this flexibility over the period of the Local Plan (to 2034).

2.5 We do not consider that the Borough Council’s Employment Topic Paper – June 2017 accurately reflects the conclusions and recommendations of the Guildford Borough Employment Land Needs Assessment – March 2017, as it limits to proposed employment floorspace for B1c/B2/B8 to the same amount as that stated in the Assessments conclusions, but without providing any allowance for flexibility (paragraphs 4.7 to 4.10). The 2017 Assessment is very clear that demand for employment land within Guildford could be higher than the forecasts, and this should be reflected in the amount of land allocated for B1(c), B2 and B8 employment in this Local Plan. No such flexibility is proposed and the Local Plan currently even proposes a reduction in both the lower and upper ranges of new B1(c), B2 and B8 floorspace, (Policy E1(8)). As such we do not consider that this part of the Local Plan is ‘positively prepared,’ and is therefore unsound.

2.6 These objections incorporate an Employment Statement by Kingstons, independent commercial agents, based in Guildford, who specialise in the office and industrial warehouse sectors in Surrey and neighbouring counties (Appendix C). This Employment Statement provides strong evidence for the need for the Local Plan to significantly increase its proposed new employment land in Policy E1(1). In addition, it explains how the Ewbank’s site is the ideal site for additional employment land, being adjacent to the currently proposed strategic employment site at Land around Burnt Common Warehouse, with the flexibility to provide a range of employment development opportunities.

2.7 In summary, this Employment Statement by Kingstons provides the following reasons why the Local Plan should provide additional employment land.

2.8 It is important that employment land allocations are spread amongst several owners, in order to ensure that there is competition between sites, and there is a mix of new employment developments serving different employment requirements.

2.9 There has been a significant loss of existing industrial sites from employment use, which will need replacement new employment floorspace within the Borough, just to maintain the existing supply. Some of these industrial sites have been of a significant size, of between 25,000 square feet and 10,000 square feet.

2.10 There is a requirement for ‘multiple sites,’ due to ‘single occupier’ take up. A single occupier, such as a major ‘on-line’ supplier, could require in the order of 150,000 square feet, which could take up the whole of the proposed new employment land in one development. This is clearly not a sustainable position, and certainly is not allowing for continuing new employment development throughout the plan period.

2.11 There is a need to provide sites of different ‘shapes,’ which will provide opportunities for small industrial and storage units over the plan period. The Ewbank’s site provides such flexibility.

2.12 One of the important evidence-base reasons for the need for additional new employment land is the significant demand from existing businesses in the Borough, with well over 50% planning to expand their operations.

2.13 Recent evidence of ‘take up’ of new employment land is significant, and the existing strategic employment sites have very little capacity for new employment development. This is clearly demonstrated in the Guildford Borough Employment
Land Needs Assessment, which contains a Schedule of all the Strategic Employment Sites in the Borough. It shows that a vast majority of these sites have no potential over and above existing permissions for new employment development.

2.14 In the light of this evidence, we submit that for this Local Plan to be ‘sound’ in relation to new employment land, the proposed new employment floorspace in Policy E1(1) should be significantly increased. The addition of the Ewbank’s site of 3.49 hectares to the proposed Strategic Employment Site at Land around Burnt Common Warehouse would make a significant contribution to the required additional employment land, to ensure that sufficient land for B1(c), B2 and B8 uses is available throughout the period of the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2474  Respondent: 11063009 / Andy Shaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford

As residents of Normandy for over 30 years, we write to object to the GBC Local Plan 2016 for the following reasons:

- We see no justification or 'exceptional circumstances' for Site A46 to be released from the Green Belt. There has been no explanation why development has to be on this red sensitivity status site.
- The local roads are already overstretched and have been steadily deteriorating over many years. The development will increase pressure on the traffic from Normandy towards and across Guildford on the A3 and other local roads, which is already a nightmare, resulting in longer and longer 'peak' hours at each end of the working day. Public transport never has been or will be an adequate substitute. The railway under and over bridges on Westwood Lane and Glaziers Lane are a constraint on the flow of traffic and considered unsafe due to inadequate sightlines.
- There is no current need for a new secondary school in this area and may only be required if the development is permitted to proceed. At present, we are adequately served by the existing secondary schools whereas the primary schools are under tremendous pressure.
- Other amenities in the village would not be able to meet the increased need produced by the additional population.
- There has been no consistent application of considerations of sustainability and sensitivity as applied to Normandy and Flexford. They are treated as one settlement when assessing sustainability but treated separately for sensitivity.
- We have been seeing far fewer species of birds and small mammals over recent years and the proposed additional households means even more dogs and cats in the area, increasing predation of wildlife.

The plan is considered unrealistic and would result in the destruction of our rural environment and we wish our views to be taken into account.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/4264  Respondent: 11063233 / David Ebdon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My letter is couched in general terms but nevertheless should not be disregarded as I can see the implications and effects of the proposed plan and to which I OBJECT.

It is quite clear from all the meetings and conversations/reports that I have followed that your plan is deeply flawed, is not impartial, is for economic growth rather than local need and is based on contortions of any ‘evidence’ used to fulfil criteria for these goals.

The primary OBJECTION is to the housing numbers (hotly disputed) for the whole of Guildford area. This has never been substantiated and it appears that the number stated is based on a Strategic Housing Market Assessment which has never been revealed. Only recently have we been advised in the news that demand for housing in recent months has dropped. The inflated number of new houses required in the Guildford area would deal with a population growth higher than official national estimates in the borough with more than a fair share in the Horsleys. There is no explanation of why, since the consultation on the 2013 plan, the target has been raised from 232 homes per year to over 652.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4263  Respondent: 11063233 / David Ebdon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object most strongly to your proposed plan to carry out extensive housing development in the Guildford area, particularly in the Horsleys.

West Horsley's defined Settlement Area boundaries (ref 2003 Local Plan) DO NOT need to be extended. West Horsley Parish is one of a rich and varied mix of well-established low housing density settlements with a considerable number of historic buildings. Positioned on the north side of the North Downs, partly in the Surrey Hills AONB, it attracts a considerable number of recreational visitors (walkers and cyclists) through the seasons each year.

The number of proposed new homes will swamp the village of West Horsley and change its nature irrevocably. Village expansion is unsustainable. With only one small shop, no post office, a very limited ‘weekdays only’ bus service through the village, it is clearly unsustainable for the proposed high volumes of new housing development.

The development of 385 homes on the 4 proposed sites are at much higher densities than currently exist in the village settlement and will be totally out of character with the existing mix of different housing styles and layout of the village. The
homes building proposals are unsustainable in terms of all the above not to mention parking in East Horsley shopping areas and particularly at Horsley station which is virtually full on a daily basis and of course, public transport.

The planned development on Green Belt is therefore unsustainable.

Now that the Council has acknowledged the ‘West Horsley Neighbourhood Area’ (which it did on 8 September 2014 - The West Horsley Neighbourhood Area follows the boundary of West Horsley parish) following an application by West Horsley Parish Council and a six week consultation, it is hoped that the Council will listen to and acknowledge the views of the parish council in future planning matters.

The need for so many houses to be built in West Horsley over the first 5 years of the Plan period 2018 to 2033 is totally unproven. The West Horsley Parish Council and Surrey Community Action Housing Survey: May 2014, identified a limited need for some 20 affordable homes for local people who want to remain in the village, i.e. for young people and for elderly people who wish downsize to a smaller home.

If this is a “Local Plan” which was has been subjected to extensive consultation and vociferous objection by the electorate of Guildford Borough, why is Guildford Borough Council (GBC) perusing this as it is so clearly unsupported by locals. Are you reacting to and being dictated to by central government? It seems so.

Surely the purpose of a Local Plan is to meet local needs and objectives as set out in the Neighbourhood plan, not those handed down from Westminster.

The planning officers and councillors of GBC have signally failed to listen to the concerns about the destruction of the green belt in West Horsley. The draft local plan would result in the urbanisation of this small hamlet. The infrastructure of both the Horsleys, East and West, would not cope with more than a small increase in housing numbers.

In conclusion, I urge GBC to revise the housing number to a more realistic and required number, and to amend the Local Plan to utilise brownfield or previously used land rather than green field sites. There are plenty of brownfield and previously used land sites within the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17417  Respondent: 11063233 / David Ebdon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The fact that Station Parade is designated a ‘District Centre’ is totally misleading and has therefore quite incorrectly attracted a spurious need for new houses. Something that again shows a complete lack of local understanding of the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Have you seen the traffic congestion on the M25 near the A3? Have you seen how difficult it is to join the M25 from the A3 in the mornings? Have you seen the congestion leaving the M25 for those who work in our area? Yet…………… you are proposing more housing and encouraging more jobs for people outside our area without a thought of improving the infrastructure………which after all should be considered well ahead of any future development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

This leads to the next most important subject and features of your plan……….”Developing in the GREEN BELT.” Not even in exceptional circumstances can the Green Belt be developed and these have anyway not been demonstrated.

I OBJECT therefore to your policy P2 where although you state that the Green Belt must be protected, you go on to remove parts of West Horsley from it through these needless development proposals.

Apart from anything else, our Green Belt is very precious. It is what protects London from urban sprawl; it preserves air quality; it prevents flooding (which is very apparent in Horsley; especially on at least two of the sites that you have proposed for development); it is for us to conserve and protect.

Once these inflated housing numbers have been discredited, the whole plan falls apart.

The National Planning Policy Framework (NPPF) states that the Green Belt boundaries should NOT be changed unless there are exceptional circumstances. Again, unmet housing need is NOT an exceptional circumstance. In addition the existence of the Green Belt or Areas of Natural Beauty prevents such over assessed housing needs and is a constraint against unnecessary development. Moreover, ministerial guidance has been published that makes it clear that unmet housing need should NOT normally be taken as such an exceptional circumstance. No exceptional circumstances have been disclosed. To remove most of the Borough’s Villages from the Green Belt would change the nature of this area of countryside forever and would eventually merge historic and separate villages. Something the Green belt was set up to avoid.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/17419  Respondent: 11063233 / David Ebdon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Our drains (both foul and surface water), our water supply, our medical facilities, our schools and our roads cannot cope with our existing population let alone the proposed increase which would follow the planned number of new homes. Building this number of homes will lead to greater flood risk in Horsley and downstream (along the Wey and Thames). Ripley Lane is often flooded after a few hours of rain and impassable in a car near Jury’s Farm as are other areas adjacent to your proposed sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17418  Respondent: 11063233 / David Ebdon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There are many brownfield sites available in the Guildford town centre which at the moment is being earmarked for commercial development rather than for housing. These sites would be enough to meet our real needs for affordable local homes. There are enough vacant commercial sites to cope with genuine business need, and we have enough retail capacity already, so urban brownfield/derelict land should be used for housing. Surrey University already has planning permission for more than 1,500 accommodation units on its own brownfield campus but for several years has postponed this development. If the University were to complete this development, much of the town centre affordable accommodation would be available for rental/purchase.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1966  Respondent: 11063233 / David Ebdon  Agent:
The information in the draft plan and its size may seem too complicated for many individuals to take in but that does not stop ‘us’ understanding the overall policies that you are putting forward. One wonders about the qualifications and experience of the people who have put this plan together. What expertise and experience do they have? What local knowledge have they digested? The fact the Wisley site is still included in the draft Local Plan makes one question the whole ethos of the GBC Executive. The councilors unanimously decided on 14 counts that the site was unsuitable and yet it is still in this local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/354  Respondent: 11064161 / Adrienne Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (south)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I Object – Please count my objection

Dear Sir or Madam

I would like you to note my objections to any proposed planning applications and changes to boundaries on the area of Shalford by the bowling green with access to Chinthurst Lane.

1. Green Belt boundaries have been in place for decades and are in place for good reason. There is no valid reason for changing the boundaries. Apparently leaving the EU is going to save all the problems of overcrowding and immigration therefore it will be unnecessary to keep building. The only people to benefit are the already wealthy developers who do not care where they develop as long as it does not affect themselves personally. The council should not be assisting developers by ruining existing villages. The owners of this land have been trying to develop it for years. They can only interested in the profit to be made.

2. A large number of the residents of Shalford object to these proposals. The wishes of the residents should not be ignored.

3. This area of land is elevated and highly visible from the village hall, bowling green and village facilities which are regularly used by all. A housing development on this high elevation will ruin the character and setting. The land is much higher than the Village Green and Pond and will be visible. It is such a high elevation that the surrounding houses will be overlooked. The character of the centre of the village will be ruined and changed forever.

4. Chinthurst Lane is narrow and already dangerous, with many bends, single tracks with no passing places and no pavements. Because of many new developments along the A281 it has become a rat run in recent years. It is a
short cut for traffic going to Guildford to avoid the very congested A281. If you listen to Eagle Radio the A 281 through Shalford gets a mention on the traffic news every day. Chinthurst Lane has traffic backed up every morning to as far back as Polar Road and it is getting worse. There is no more room for more vehicles.

5. The existing infrastructure cannot cope. Every morning cars are parked all over the village and left all day as the owners commute to work. Roads are at a stand still. Schools are unable to cope with the numbers of children.

Developments should only be allowed where our old traditional villages can remain unspoilt and where the infrastructure is in place to cope with a large influx of new residents. The importance of keeping the countryside in tact for future generations is obvious. There are numerous brown field sites across Surrey and the South East and within this borough. If development has to happen surely it is those areas that should be used first rather than changing existing boundaries at the expense of village life.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPS16/6014 | Respondent: | 11064737 / Graham Rowe | Agent: |
|-------------|--------------|-------------|-------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy A35 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I have lived in Ockham now for 10 years, and have lost track of the number of letters I have had to write to you in objection to large scale development on this site. You seem hell-bent on ruining a part of the greenbelt, planting a totally unsustainable development on the Greenbelt and effectively eliminating the historic hamlet of Ockham. I am particularly distressed to see that since this proposal was last dismissed by the Planning committee, the land has now expanded and moved even closer to the residents along Ockham Lane (including our own house).

In summary then I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
• I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have read the voluminous reports purporting to the above and have several significant objections:

There are too many homes being proposed to be built too fast for a village without the necessary infrastructure to cope with such an expansion.

1) I am totally opposed to the West Horsley village’s removal from the Green Belt by insetting and extending the 2003 Local Plan Settlement Area boundaries. There are NO exceptional circumstances other than in a developer’s eyes…!

The policy states that provision will be made for 13,800 new homes over the Plan Period 2103 - 2033; this is far too high and is unsustainable in Guildford's villages.

2) The Key Evidence document makes no case for locating the proposed large numbers of homes in West and East Horsley villages.

3) Village expansion in particular in West Horsley is unviable; there is only one small shop (which is under sale negotiations at the moment and is not guaranteed to remain as a shop), no Post Office, a very limited weekdays only bus service through the village. It is clearly unsustainable to accommodate the high number of homes proposed. The development of 385 propose homes on the 4 sites is with much higher densities than currently exist in the village and will be totally out of character with the existing mix of housing and layout of the village. Also, the need for so many house to be built in West Horsely over the first 5 years of the Plan Period is not proven; the West Horsley Parish Council identified a limited number of about 20 affordable homes for local people (the younger and older residents) who wish to remain in the village.

4) The homes proposal do not take into account the tremendous effect that such a large number of homes and people, as proposed in the Plan Period, will have on an already creaking local infrastructure, in the terms of schooling, drainage, roads capacity and maintenance, shops, parking (in East Horsely - the shops and the station) and public transport, or rather lack of it…!!

5) On another point Policy i3 states that developers would be expected to propose and secure travel plans for their developments and contribute to transport and arrangements for the disabled - my experience proves that this is lacking and therefore the policy lacks teeth to impose rather than expect.

6) There is a continuing lack of clarity as to schools in the area and the influx of large number of home and therefore families with children will worsen this situation. The Raleigh school serving East and West Horsley want to move and expand but this is only preliminary at the moment and will take several years to build and complete - otherwise it is FULL. Schools in the area (Glenske and Canmore) also currently provide major difficulties for the road transport system at certain times of the day!! the Definitions and Policy ! Infrastructure and Delivery mentions “schools”; but it is rather vague in the extreme…!!

7) medical facilities at the Kingston Avenue Medical Centre, serving East AND West Horsley, are already stretched and residents experience difficulties in making timely appointments. The planned increase would swamp the current facilities…..!

8) Roads and transport Infrastructure, while again mentioned in the Definitions and Policy: Infrastructure and Delivery, there is no specific mention for West Horsley….While there is a reasonable frequency of trains to London and Guildford during the 7 day week, the station carping is normally full on weekdays, and certainly an increase in the population of the size envisaged would have an unbearable pressure on the station parking and indeed traffic movements in general for work, schools and shopping. Car ownership in village areas tends to be two cars, or even three, meaning journey times on local roads will increase significantly.
There are current, known sewage overflow problems in the Okham Road North/ Green Lane and East Lane areas, Also, Thames Water has advised that the area’s wastewater area in unlikely to support the demand anticipated from all the proposed developments. They advise it will take 2-3 years’ construction to install the drains/pipes etc AFTER planning permission has been granted.

All in all, this does not appear to have been properly thought out for modern times and modern living with significant chances of environmental and social disaster. It is simply too many homes for villages without the necessary infrastructure to cope, and vague in setting out developer’s responsibilities at the outset; the developers will be able to make significant amount of money/profits in high value housing area without due though for the local community(ies).

I trust that these comments will be taken into account when decisions are being considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/881  Respondent: 11066401 / Vivien Meldrum  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H1- the university of Surrey should be required to build more than 60% student accommodation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/889  Respondent: 11066401 / Vivien Meldrum  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy ID1 – The transport aspects of the Plan cannot be regarded as sound. The Plan provides a vivid description of the conditions on the network today and the evidence is that these will be as poor, and in some cases worse, at the end of the plan period, even with the mitigation measures. The evidence provided indicates that congestion will be widespread on much of the highway network in peak periods, even with the proposed highway schemes and with the measures to encourage the use of public transport in place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S2- The policy is unsound as the OAN is still far too high and should be set at no more than 404 new homes per year in accordance with the advice of NM Solutions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

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- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4102  Respondent: 11067393 / Gillian Barden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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• result in rat-running through local roads
• add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/472  Respondent: 11067393 / Gillian Barden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Page 1178 of 2855
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12827  Respondent: 11069089 / Sarah Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The local infrastructure is overstretched and the enormity of the proposed developments are infeasible. Projecting a potential future of poorer and few resources for those living in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12826  Respondent: 11069089 / Sarah Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
There is no exceptional circumstance that has been demonstrated to require Horsley to be removed from the green belt. Extension of the boundary area of Horsley is being attempted with no sound reason for this action.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1738  Respondent: 11069601 / Barry Kiddell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A25.

It could never satisfy Policy S1.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1739  Respondent: 11069601 / Barry Kiddell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I Object to Policy A35.

It could never satisfy Policy S1.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1740  Respondent: 11069601 / Barry Kiddell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A36
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I Object to Policy A41.
It could never satisfy Policy S1.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1746  Respondent: 11069601 / Barry Kiddell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I Object to Policy A42.
It could never satisfy Policy S1.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1747  Respondent: 11069601 / Barry Kiddell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I Object to Policy A43.
It could never satisfy Policy S1.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1748  Respondent: 11069601 / Barry Kiddell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
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### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I write in connection with the above.

I object to policy H1.

Having a policy of Homes for All is a complete nonsense when the type of housing that gets built is completely at the mercy of developers driven by profit, and the vagaries of the housing market.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I Object to Policy H2.

There is no point in having a policy for Affordable Homes when their provision will always be at the whim of profit motivated developers and the state of the housing market. In any case the definition of “affordable” bears absolutely no relation to what can actually be paid by people, perhaps in essential jobs, who have to live in this over-priced borough.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
I Object to Policy S1

It is simply not possible for development of any of the identified sites to ever be sustainable in the terms detailed in the Sustainability Appraisal which forms part of the draft.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Finally, I am dismayed that I am being consulted again after I had already sent my views to the earlier draft plan. The money wasted on repeating this exercise is not acceptable. I suggest that it is funded by the Councillors responsible for the fiasco and not by the residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPA16/4399</th>
<th>Respondent: 11069921 / Sarah Keel</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Re. The Guildford Plan

I am concerned, and unhappy, about The Guildford Plan.

I object to the proposal to remove Green Belt land from the Horsleys. I also object to the idea of ‘insetting’ the Horsleys. I object too to the proposal of SANGs.

I have major concerns and objections to the proposal to remove East and West Horsley land from the Green Belt. Residents are very worried.

I oppose the proposals to develop Green Belt land for residential development.

There are no justifications for extending settlement areas.
West Horsley's Defined Settlement Area boundaries do not need to be extended. There are not any reasonable, justifiable, nor proven with acceptable evidence, “exceptional circumstances” for insetting these Areas from the Green Belt.

The Horsleys do not have suitable infrastructure for large scale development.

The provision of properties for first time buyers is not a reasonable excuse for building large scale, high density housing on land that should remain as undeveloped green belt land. The Horsleys is not a first time buyers destination of choice. Any argument for creating first time buyers housing is short sighted. Housing would quite easily increase in price very quickly and in just one sale along it could be far higher than a proposed ‘first time buyers’ property, making such an argument utterly ludicrous.

Local schools are full. The current idea that The Raleigh school could be rebuilt is wholly unacceptable as it is being proposed that it be rebuilt on green belt land. The Raleigh School is being used a pawn in the Guildford Plan’s proposals.

The village shops at East Horsley have been incorrectly classified. They are not a significant commerce hub. The village shops are a small row of stores and amenities. As such, they serve the village well, but they are not a significant commercial destination and do not support the proposal of the increased population set out by The Guildford Plan.

The density in the proposed development sites is of a density out of keeping with the Horsleys and is of a density that would have an unacceptable negative impact on the infrastructure.

It is not shown in the Guildford Plan that Brownfield sites are being developed ahead of Green Belt sites. Green Belt sites must only be used for development in exceptional circumstances. There are no proven exceptional circumstances for the developments proposed in the Guildford Plan.

I am concerned and object to the proposals to build on Green Belt land at Long Reach. There is an area of this land that directly backs onto existing residential properties and the existing residential properties would have a loss of privacy by having the Green Belt land developed to their boundaries.

The density of housing being proposed at Long Reach is of an unacceptable high density. The land at Long Reach should remain as Green Belt land.

It has been proposed in the Guildford Plan that Benswood would act as an alternative greenspace. Benswood is already green and the area being proposed for development at Long Reach is already green. How can the development of a Green Belt area be justified by suggesting that it can be replaced by another area that is itself already Green Belt? It is a simple fact of mathematics that ‘two minus one = one’. The Guildford Plan makes the most bizarre proposals that ‘two minus one = no difference, just alternative’. This is an outrageous con and I object to it.

Green Belt land must be protected and persevered. Once it is gone it is gone forever. We must not be the generation that selfishly sold off land and took away the Green Belt. We must preserve and protect the Horsleys Green Belt land for future generations.

Please consider the above comments as concerns and objections to The Guildford Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object most strongly to your proposal to build 135 houses at the so-called Manor Farm Site. We already have high density housing in Long Reach, not only on the road itself but also in the two original council housing cul-de-sacs namely Woodside and Farley's Close. An aerial view of the site would suggest that it could fit in like a piece in a jigsaw. However, there is a noticeable exception and that is the northern boundary which does not follow the line and is indisputably outside the natural envelope of the village. The field contained therein should not be included in the plan and it seems to have been tacked on to make the site more appealing by having possibly two access points. The fact that the road Long Reach is completely unsuitable as an artery seems to have escaped the attention of the planners. I genuinely feel that it's a possibility that no member of the planning committee has ever visited it, certainly not at a weekend!

To attempt to shoe-horn in further cheek-by-jowl housing would create a volume with which the village simply couldn't cope. It's not just the schools, doctors' surgeries, roads, trains, station car parks etc. being ridiculously over-subscribed, it's more than that. The seemingly vindictive attempt to blight West Horsley with this site and all the others would reduce this village to a congested dormitory and change it's character forever whilst the developers can walk away with full wallets leaving the residents to pick up the pieces.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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15. APPENDIX C

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that the Council was required to give proper consideration to constraints.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4039  Respondent: 11070113 / Alison Hague  Agent:

16. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D). The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPA16/4034   Respondent:  11070113 / Alison Hague   Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Clandon

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT to the Guildford Borough Proposed Submission Local Plan (June 2016).

I am particularly concerned that more weight should be given to the effect on the existing rural communities, including the local communities of West Clandon, Send and Ripley, with regard to:

1. the effect that increased motor traffic would have on these communities;
2. to the need that any development to existing rural communities should be proportionate to the size and nature of those existing rural communities and should preserve their rural character;
3. the need to maintain the Green Belt; and
4. the need to ensure that the Plan does not set into unstoppable motion an unsustainable programme which does not contain adequate checks and balances to safeguard our existing rural communities.

I am particularly concerned that insufficient weight has been given to the effect that Policy 43a (New A3 slip-roads at Send-Marsh/Burnt Common), Policy 43 (Garlick’s Arch) and Policy A25 (Gosden Hill Farm) will have on the rural communities of West Clandon, Send and Ripley, and particularly WEST CLANDON.

West Clandon is a linear village stretching for approximately 3km or 2 miles from the current A3 Burnt Common southbound entrance slip-road, south along the A247 to the traffic lights at the junction with the A25/A246, just south of West Clandon church. West Clandon has a historic centre with a church, two pubs, a branch of the Royal British Legion, an infant school, an old people's home (Ashley Park), a recreation ground and Clandon Park (a historic National Trust property currently under reconstruction after being damaged by fire). West Clandon has a railway crossed by a hump-backed bridge and a railway station. The southern half of the village is in a conservation area. The village comprises approximately 500 homes.

The A247 through West Clandon, known as “The Street” or at the north end of the village “Clandon Road”, runs right the way through the village. In places it is narrow and windy with significant bends. In parts there is a footpath only on one side and the road is so narrow that it is frequently mounted by lorries. There is a constant stream of broken wing-mirrors left behind as debris evidencing the narrowness of The Street at some sections. Within the last couple of years there has been at least one collision between a vehicle and a building (Summers Barn) at a narrow section. The A247 already has a disproportionate amount of traffic to cope with compared to neighbouring villages because it has a road crossing over (rather than under) the railway line.

Around 100 houses, businesses and amenities have an access directly onto The Street (or Clandon Road). Some of these have very limited visibility (lines of sight), or in some cases zero visibility, of oncoming traffic in either direction, except through the use of mirrors. My own property is situated on the inside of the crown of a narrow bend and we rely totally on
mirrors for sight of traffic as we exit the property. We are by no means alone. The approach road to West Clandon railway station and the Onslow Arms pub are two more examples of entrances onto The Street with extremely limited visibility – in the case of the railway station because of the hump-backed bridge, and in the case of The Onslow Arms pub, because the pub building itself is situated on the road and obscures a clear view of traffic approaching from the north. Within the last two weeks there has been a road traffic accident outside The Onslow Arms with one of the vehicles ending up in the garden of Brownlow Cottage opposite the pub. Accidents and near-misses at the junction of Clandon station approach with The Street are extremely common and this is well-known as a dangerous junction with very limited visibility of traffic approaching from the north.

The danger of traffic in West Clandon not only affects vehicles but also pedestrians. The linear nature of the village, plus the fact that the road is only wide enough for a footpath on one side at various points, means that the frequency of passing vehicles can make it difficult for pedestrians to enter and exit some properties at busy times. The same limited visibility from some entrances of traffic on The Street that affects people leaving these properties by vehicle also affects pedestrians. I myself experience this every day as I leave my property on-foot, since my home is located on the inside of the crown of a bend and I rely on a mirror for my only view of the traffic. For an elderly person or a child this would be highly dangerous or impossible. If the volume of traffic increases, the situation will become worse and there is a risk that the difficulties of access would make some villagers in West Clandon virtual prisoners in their own homes.

The A247 splits the village of West Clandon in half. It divides the church on the west side of The Street from its car park on the east side of The Street. It has to be negotiated by elderly residents of the Ashley Park Care Home, children and parents dropping off or collecting from the Clandon Infant School, users of the two pubs on opposite sides of the road, the railway station, the Recreation Ground and The Royal British Legion.

If there is a higher volume of traffic (at whatever speed), it will be harder to find a gap in the traffic during busy times in order to safely cross The Street. Once a certain critical volume is exceeded this will become virtually impossible. For the elderly or infirm and for children it is already very difficult for them to cross from one half of the village to the other with the very limited visibility that exists in some areas. A pedestrian crossing cannot be provided from every house or every business or amenity and there is insufficient room to allow footpaths to be built on both sides of The Street.

Users of several public footpaths crossing The Street, including one on a severe bend near the church, will be put at greater risk. The same is true for pedestrians crossing from the graveyard, Ashley Park old people's home or the church car park, all of which are on the east side of The Street, to the church side of the A247 which has the only pavement at that point.

The number of cyclists that use the A247 as a route to access The North Downs has increased massively following the well publicised use of cycle routes in this area during the Olympics and in national cycle events. The A247 is now a corridor for cyclists accessing the Downs from Woking and beyond. The winding and narrow nature of the A247 makes it difficult for other vehicles to overtake these cyclists. If the volume of traffic increases then this will only make this problem worse and lead to a higher risk of accidents as more vehicles try to overtake cyclists on narrow winding roads.

Many of the above concerns are specific to West Clandon because it is a linear village divided by the A247 which is narrow, winding and in places bordered by a footpath on only one side. Because it winds through the historic centre of West Clandon there is no possibility of the A247 being widened or of additional footpaths being provided alongside the road, or of improvements to visibility for entrances on to or off The Street. For all of these reasons I consider any significant increase in the volume of traffic on the A247 through West Clandon could have a seriously damaging impact on the quality of life of residents of West Clandon including the approximately 100 homes with entrances directly off The Street/Clandon Road, and on users of West Clandon's railway station, pubs, infant school, church, old people's home, Royal British Legion club, recreation ground and public footpaths.

I am concerned that the provision of 400 homes plus industrial, storage and distribution units at Garlick's Arch just to the north east of West Clandon, an additional entrance and exit to the A3 at Burnt Common, and 2000 homes at Gosden Hill Farm, will produce a much greater volume of traffic on the A247 through West Clandon, particularly at busy times. I OBJECT because I do not believe there has been a proper assessment of the likely impact of these three proposals on the volume of traffic though West Clandon and the effect that this will have on that community, or that any assessment has been properly taken into account. I OBJECT because a key consideration should be the effect on existing neighbouring communities, taking into account the specific circumstances of those communities. A key consideration for Policy 43a (New A3 slip-roads at Send-Marsh/Burnt Common), Policy 43 (Garlick’s Arch) and Policy A25 (Gosden Hill Farm) should
be the effect of the increased traffic that these policies and the Plan as a whole will have on the community of West Clandon and neighbouring communities of Ripley and Send.

Additionally the scale of the proposed developments in the vicinity of West Clandon are disproportionate to the size of the existing rural community.

Moreover the Plan as a whole is unsustainable, unworkable and, in many provisions, unnecessary. I set out below additional objections to specific policies and matters within the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

13. POLICY A25 - Gosden Hill Farm

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement. There is also very limited visibility from some houses, businesses and amenities for vehicles turning onto The Street or for pedestrians trying to cross The Street (e.g. Clandon railway station approach, Onslow Arms car park, Bull's Head car park, West Clandon church car park).

Note the following accident data: 2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

2016

• 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
• 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
• 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road
• July 2016 Collision outside Onslow Arms resulting in one vehicle ending up in garden of cottage opposite

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

It is estimated the development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day, and where there are already difficulties accessing properties, businesses and amenities, and through Send and Ripley which are also severely constrained.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.
Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7527  Respondent: 11070113 / Alison Hague  Agent: 11070113

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

14. POLICY A43 AND A43a – Garlick’s Arch

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council’s eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it.

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.
Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPS16/7528  **Respondent:** 11070113 / Alison Hague  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16742  Respondent: 11070113 / Alison Hague  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16748  Respondent: 11070113 / Alison Hague  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
8. POLICY D3

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/16749</th>
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9. POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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11. POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable, much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourist
To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spendi The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

3. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16747  Respondent: 11070113 / Alison Hague  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
7. POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF. The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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10. POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes. The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

### 5. POLICY I1

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1).

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems. With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians. The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon, The Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements. The bends and narrow width of the road in West Clandon make the road difficult to access from some of the 100 or so houses, businesses and amenities with entrances onto the road (e.g. Onslow Arms pub, Clandon railway station). The same difficulty is experienced by pedestrians and the fact that there is only a footpath on one side of the road makes it impossible to improve safety for pedestrians crossing the road in many places. These problems will become worse with increased traffic.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside

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the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways. Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable. There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/16745  **Respondent:** 11070113 / Alison Hague  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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6. **POLICY I2**

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2) I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network.

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan. There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/16739  **Respondent:** 11070113 / Alison Hague  **Agent:**
3. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2).

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions. Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I do not believe this to be true.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever. There is a real
danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16754  Respondent: 11070113 / Alison Hague  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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12. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraint. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16730  Respondent: 11070113 / Alison Hague  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework.
Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

The narrow and windy nature of the A247 through West Clandon and the dangers of entering and exiting the over 100 properties and amenities which have entrances directly onto this road have not been taken into account.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/16735</th>
<th>Respondent: 11070113 / Alison Hague</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2).

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri- borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt.

It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints.
It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The road infrastructure in West Clandon has the added disadvantage that West Clandon is a linear village and the road through it is narrow in places with many bends and poor visibility for access for pedestrians and vehicles alike. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1841  Respondent: 11070113 / Alison Hague  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Questions posed by Guildford Borough Council as part of its consultation. Questions from GBC

Question 1: The evidence base and submission documents

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

ANSWER
I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016</td>
<td>Question 2: Legal compliance</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole as legally compliant? Please provide the following information being as precise as possible:

- why you consider it is or is not legally compliant and
- what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal. As a result I do not see how the 2016 draft Plan can be Legally Compliant.
The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1843  Respondent: 11070113 / Alison Hague  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

1. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopte

2. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

1. The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites-which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitment. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

5. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.

6. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.

7. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound.

8. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018.

9. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars.

10. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.

11. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

12. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation.

13. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involve. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

1. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

2. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

3. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

5. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secure.

6. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Question 4: Duty to cooperate

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

- why you consider it has or has not complied with the Duty to cooperate and
- what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough. The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages. This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy A25 GOSDEN HILL – My Objections

1) Gosden Hill development of 1700 houses. Reference to a potential link road from the development to the A247. The clear implication is for an access from the development to the A247 with enormous traffic implications for the A247.

2) South bound off- and on- slip roads to service the development and replace the existing off- slip road to Burpham. The only North bound access to the A3 will be via the existing slip road off Clay Lane. (See later, Burnt Common).

3) A 4-entry form secondary school, a primary school, a retail centre and a park and ride for up to 700 cars.

4) When developed, the new employment site at the north side of Gosden Hill Farm (site allocation A25) will be treated as an Office and Research & Development Strategic Employment Site (7000sq.m). This could mean several hundred employees.

5) The development of this site will cause massive congestion in surrounding roads. It will generate many thousands of vehicle movements onto the A3 which is already at a crawl every day during peak periods.

6) The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.

7) The proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress.

8) The A247 through West Clandon is not suited to cope with additional traffic for reasons including: (i) although notionally an A-road the A247 is narrow and winding in parts and is most unsuited to carrying additional traffic, (ii) the A247 has a single non-continuous footpath in several sections, (iii) a care home, a church car park and a pub, as well as very many houses, are located on the opposite side of the road to the only footpath, making pedestrian access difficult for people moving about the village on foot, especially for elderly and disabled people; (iv) the railway station and other commercial and residential properties have poor sight lines for access onto the A247 and difficulties in accessing the A247 from these properties will be exacerbated by increased traffic volume (and fewer “gaps” between cars); (v) the A247 is popular with cyclists and because of its narrow and winding nature the potential for accidents that additional traffic will cause is clear.

9) I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too many.

10) There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

11) Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of Green Belt.

12) The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity.

13) The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

14) The development of this site cannot be sustainable and will cause massive congestion on surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3. The A3 is at a crawl every day during peak periods, and often at weekends as well. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
15) I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress.

16) The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

17) A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

18) The A247 may be an A-road on the map but in reality it is a residential road with numerous bends, narrow sections and side-entrances. The road through West Clandon already has numerous accident black spots, such as: (I) the exit from Clandon station which has extremely poor sight lines due to a humped back bridge where numerous accidents have occurred; (ii) the exit from the Onslow Arms pub which is almost blind due to the pub building being adjacent the road - a vehicle has recently ended up in the garden of the cottage opposite; (iii) the narrow section outside “Summers” which is regularly littered with the wing mirrors of cars which have made contact, as well as being a dangerous area for pedestrians due to vehicles mounting the pavement to try to pass; (iv) the winding section outside Clandon Regis and near the primary school which regularly suffers from demolition of gate posts and fences as vehicles leave the road; (v) the bend near West Clandon church which has seen damage caused to the flint wall in recent years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4214  Respondent: 11070113 / Alison Hague  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A35 – My Objections

79) The Wisley development of a new village / town with at least 2000 houses, 4-entry form secondary school and employment land. The development does not meet the NPPF requirement, namely that developments that generate significant movement will be located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. The provision of slip roads at the A3/A247 junction to relieve the impact of this development on Ripley will have potentially severe effects on the A247.

80) My objections to increased traffic on the A247 through West Clandon are outlined more fully elsewhere but include: (i) although notionally an A-road the A247 is narrow and winding in parts and is most unsuited to carrying additional traffic, (ii) the A247 has a single non-continuous footpath in several sections, (iii) a care home, a church car park and a pub, as well as very many houses, are located on the opposite side of the road to the only footpath, making pedestrian access difficult for people moving about the village on foot, especially for elderly and disabled people; (iv) the railway station and other commercial and residential properties have poor sight lines for access onto the A247 and difficulties in accessing the A247 from these properties will be exacerbated by increased traffic volume (and fewer “gaps” between cars); (v) the A247 is popular with cyclists and because of its narrow and winding nature the potential for accidents that additional traffic will cause is clear.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43a BURNT COMMON SLIP ROADS – My Objections

50) Provision of a northbound on-slip road and a southbound off-slip road to the A3 to join the A247. These are stated to be required to relieve Ripley from the effects of the development of Wisley. It is not clear how this would work unless traffic from Wisley wishing to go south either goes up to the A3/M25 roundabout and comes back down the A3 or (as is claimed by the promoters of the Wisley development), direct access to the A3 southbound is provided at Wisley/Ockham. In either case, slip roads at the A247 seem unnecessary. It is more likely that these slip roads are intended to provide access to the Garlick’s Arch and Burnt Common developments. The slip roads will have the effect of creating an all-ways junction with the A3 at Burnt Common making it a centre for future development and a traffic magnet with clear implications for the A247.

51) If a 4-way junction for the A3 is deemed necessary, the logical place for it would be somewhere else, where it could enable an additional bridge to be created over the Guildford to Waterloo railway line to relieve the narrow A247 and its hump backed bridge from carrying all the north-south heavy traffic which cannot, or chooses not to, pass under the other existing railway bridges.

52) My objections to increased traffic on the A247 through West Clandon are outlined more fully elsewhere but include: (i) although notionally an A-road the A247 is narrow and winding in parts and is most unsuited to carrying additional traffic, (ii) the A247 has a single non-continuous footpath in several sections, (iii) a care home, a church car park and a pub, as well as very many houses, are located on the opposite side of the road to the only footpath, making pedestrian access difficult for people moving about the village on foot, especially for elderly and disabled people; (iv) the railway station and other commercial and residential properties have poor sight lines for access onto the A247 and difficulties in accessing the A247 from these properties will be exacerbated by increased traffic volume (and fewer “gaps” between cars); (v) the A247 is popular with cyclists and because of its narrow and winding nature the potential for accidents that additional traffic will cause is clear.

53) The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion, difficulty for people in cars and on foot wishing to move about the village of West Clandon and greater pollution. Residents and the environment will suffer as a result.

54) I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day.

55) The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.
56) The proposed developments will make it even more difficult for pedestrians to move around West Clandon village crossing from one side of the road to the other, bearing in mind that many properties can only access a footpath by crossing the A247.

57) The proposed plans will make it more difficult for vehicles to exit on to the A247 from the numerous entrances along the road, particularly in the narrow and winding section of the A247 between Clandon railway station and the A247/A25 crossroads. Many public and private properties on this section of the road have poor sight lines, including the Onslow Arms, West Clandon Church car park, Ashley Park care home, Clandon railway station.

58) Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village of West Clandon on the way to the Surrey Hills for the Olympic and the Prudential Ride London route. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local Plan.

59) The A247 may be an A-road on the map but in reality it is a residential road with numerous bends, narrow sections and side-entrances. The road through West Clandon already has numerous accident black spots, such as: (i) the exit from Clandon station which has extremely poor sight lines due to a humped back bridge where numerous accidents have occurred; (ii) the exit from the Onslow Arms pub which is almost blind due to the pub building being adjacent the road - a vehicle has recently ended up in the garden of the cottage opposite; (iii) the narrow section outside “Summers” which is regularly littered with the wing mirrors of cars which have made contact, as well as being a dangerous area for pedestrians due to vehicles mounting the pavement to try to pass; (iv) the winding section outside Clandon Regis and near the primary school which regularly suffers from demolition of gate posts and fences as vehicles leave the road; (v) the bend near West Clandon church which has seen damage caused to the flint wall in recent years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4202  Respondent: 11070113 / Alison Hague  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A58 BURNT COMMON – My Objections

60) Burnt Common strategic industrial employment site for light industry, storage and distribution activities. It is to be designated an Industrial Strategic Employment Site which means that it is a preferred site for industrial development including waste management facilities. The site is 9ha which it is stated allows for considerable future expansion. This will generate large amounts of traffic including heavy vehicles on the A247.

61) The A247 through West Clandon is not suited to cope with additional traffic for reasons including: (i) although notionally an A-road the A247 is narrow and winding in parts and is most unsuited to carrying additional traffic, (ii) the A247 has a single non-continuous footpath in several sections, (iii) a care home, a church car park and a pub, as well as very many houses, are located on the opposite side of the road to the only footpath, making pedestrian access difficult for people moving about the village on foot, especially for elderly and disabled people; (iv) the railway station and other commercial and residential properties have poor sight lines for access onto the A247 and difficulties in accessing the A247 from these properties will be exacerbated by increased traffic volume (and fewer "gaps" between cars); (v) the A247 is
62) The A247 may be an A-road on the map but in reality it is a residential road with numerous bends, narrow sections and side-entrances. The road through West Clandon already has numerous accident black spots, such as: (I) the exit from Clandon station which has extremely poor sight lines due to a humped back bridge where numerous accidents have occurred; (ii) the exit from the Onslow Arms pub which is almost blind due to the pub building being adjacent the road - a vehicle has recently ended up in the garden of the cottage opposite; (iii) the narrow section outside “Summers” which is regularly littered with the wing mirrors of cars which have made contact, as well as being a dangerous area for pedestrians due to vehicles mounting the pavement to try to pass; (iv) the winding section outside Clandon Regis and near the primary school which regularly suffers from demolition of gate posts and fences as vehicles leave the road; (v) the bend near West Clandon church which has seen damage caused to the flint wall in recent years.

63) I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site.

64) This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.

65) The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

66) There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.“

67) There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

68) The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over-allocation of 9.26 hectares at Send in the Green Belt.

69) The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607 sq.m. of B use class floorspace to come forward. This figure comprises a net loss of 4,750 sq.m. of B1a use class floorspace and a net gain of 38,357 sq.m. in B1c, B2 or B8 use class space.”

70) 38,357 sq. m. of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. If you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq. m. approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

71) The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357 sq.m.

72) The impact on small surrounding roads will create traffic gridlock.

73) It will join up existing villages and defeat the purpose of the Green Belt.
74) The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

75) The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

76) The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2420  Respondent: 11070113 / Alison Hague  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- Residents are being asked to accept very large amounts of development with little or no detail being provided on measures which would relieve existing congestion and limit future
- Much is made of the need for new infrastructure to support developments and for this to be in place as needed (listed in Appx. C to the Plan). Even if this happens the Plan admits …”we forecast that there will also be an absolute increase in overall traffic volumes”. This will be most acutely felt at junctions but these effects have apparently not been analysed so that we don’t know the location or impact.
- We can be sure however that the cumulative effects of the developments in the north east of Guildford will have a devastating impact on the A247 through the village of West Clandon (and of course on Send). It is hard to see how any of the infrastructure proposals in the Plan (Appx. C) will do anything to mitigate this impact. GBC has little or no control over the plans of Surrey County Council as the local highways authority and it is freely admitted by SCC that they have little money available.
- The Plan now calls for nearly all infrastructure to be funded by developers (see C). I question how realistic it is to expect developers not only to pay for all the infrastructure but also to have it in place in a timely fashion. The Plan says that planning permission will be refused if timely provision of infrastructure cannot be secured. Such refusals will almost certainly be challenged in the courts. Developers’ business models are based on building and selling houses to create the cash required to provide infrastructure. People will be living on the sites well before infrastructure is complete, even assuming there are funds to provide it.
- If development were to be refused the land would still have been removed from the Green Belt and its future rendered uncertain.
- All of these developments will draw very large amounts of additional traffic to the A247 through the village. It would be naïve to think that the employment sites and schools will serve only the developments themselves. Apart from the normal movements of residents to and from the new sites there will be considerable additional traffic on the A247 generated by:
  - children from elsewhere being delivered to Gosden Hill schools and collected
  - the employees of the offices and industrial sites getting to work and returning home
  - the vehicle movements generated by distribution and storage activities
- traffic from Wisley wishing to travel south and returning
- traffic from Gosden Hill wishing to travel south and returning
- traffic from Slyfield wishing to travel south and returning
- private and commercial traffic originating in the south and accessing Gosden Hill, Burnt Common or the A3 and returning (including traffic from Dunsfold)

- SCC’s business plan for Newlands Corner

I would like to point out that although the A247 is classified as an A road, it has none of the characteristics because it:
- is less than 2 vehicles wide in places. Larger vehicles routinely mount the only pavement.
- does not have continuous footpaths
- has a footpath only on one side of the road in long sections, including sections with pub, care home and church car park
- has several sharp bends
- has a hump-backed bridge over the railway, with poor sight lines
- has other entrances with poor sight lines (eg Onslow Arms, church car park)
- has a dangerous junction to access the station
- has a dangerous and unlit junction with the southbound A3 on-slip road
- has a primary school accessed by narrow pavements
- is largely unlit
- is already very congested at times, more so when delays on the A3 are severe

The A247 is in reality a residential road with numerous bends, narrow sections and side-entrances. The road through West Clandon already has numerous accident black spots, such as: (I) the exit from Clandon station which has extremely poor sight lines due to a humped back bridge where numerous accidents have occurred; (ii) the exit from the Onslow Arms pub which is almost blind due to the pub building being adjacent the road - a vehicle has recently ended up in the garden of the cottage opposite; (iii) the narrow section outside “Summers” which is regularly littered with the wing mirrors of cars which have made contact, as well as being a dangerous area for pedestrians due to vehicles mounting the pavement to try to pass; (iv) the winding section outside Clandon Regis and near the primary school which regularly suffers from demolition of gate posts and fences as vehicles leave the road; (v) the bend near West Clandon church which has seen damage caused to the flint wall in recent years.

In summary, the A247 is quite unsuited to coping with additional traffic and it is very clear that the developments proposed in the 2017 Local Plan will increase the amount of traffic on this road over and above that in the 2016 draft to which residents strongly objected. There is nothing in the Infrastructure Schedule which addresses this issue. Indeed several of the infrastructure proposals will themselves lead to significant increases in traffic on the A247.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2779  Respondent: 11070113 / Alison Hague  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1
Summary of the Impacts on the A247 – My Objections

All of these developments will draw additional traffic to the A247 through the village. It would be naïve to think that the employment sites and schools will serve only the developments themselves. Apart from the normal movements of residents to and from the new sites there will be considerable additional traffic on the A247 generated by:

- children from elsewhere being delivered to schools and collected
- the employees of the offices and industrial sites getting to work and returning home
- the vehicle movements generated by distribution and storage activities
- traffic from Wisley wishing to travel south and returning
- traffic from Gosden Hill wishing to travel south and returning
- traffic from Slyfield wishing to travel south and returning
- private and commercial traffic originating in the south and accessing Gosden Hill, Burnt Common or the A3 and returning (including traffic from Dunsfold)

The A247 although an A road:

- is less than 2 vehicle wide in places. Larger vehicles routinely mount the (only) pavement to pass one another in the narrow sections.
- does not have continuous footpaths
- has a footpath only on one side of the road in long sections, including sections with pub, care home and church car park
- has several sharp bends
- has a hump-backed bridge with poor sight lines
- has other entrances with poor sight lines (eg Onslow Arms, church car park)
- has a very difficult junction to access the station
- is largely unlit
- has a primary school
- is already very congested at times, more so when delays on the A3 are severe, which is common in the evening rush hours (4pm to 630pm) and summer weekends
- cuts through the Conservation Area of West Clandon within which 19 listed buildings are located with road frontage. A further 9 listed buildings are located on the A247 in West Clandon north of the Conservation Area.
The A247 is in reality a residential road with numerous bends, narrow sections and side-entrances. The road through West Clandon already has numerous accident black spots, such as: (i) the exit from Clandon station which has extremely poor sight lines due to a humped back bridge where numerous accidents have occurred; (ii) the exit from the Onslow Arms pub which is almost blind due to the pub building being adjacent the road - a vehicle has recently ended up in the garden of the cottage opposite; (iii) the narrow section outside “Summers” which is regularly littered with the wing mirrors of cars which have made contact, as well as being a dangerous area for pedestrians due to vehicles mounting the pavement to try to pass; (iv) the winding section outside Clandon Regis and near the primary school which regularly suffers from demolition of gate posts and fences as vehicles leave the road; (v) the bend near West Clandon church which has seen damage caused to the flint wall in recent years.

Increased traffic through West Clandon would make it difficult for people to move around the village both as pedestrians and in cars, a problem exacerbated by the many bends in the A247 in the village and by the long sections where there is only room for a footpath on one side of the road.

In short the A247 is too narrow and has too many bends to cope with increased traffic without compromising safety of cars, pedestrians and cyclists.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2501  Respondent: 11070113 / Alison Hague  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P2 Introduction – My Objections

83) The removal of Green Belt protection from the prison site means that it is likely to come forward for housing development. The nearest feasible access to the A3 is at the A247 junction.

84) My objections to increased traffic on the A247 through West Clandon are outlined more fully elsewhere but include: (i) although notionally an A-road the A247 is narrow and winding in parts and is most unsuited to carrying additional traffic, (ii) the A247 has a single non-continuous footpath in several sections, (iii) a care home, a church car park and a pub, as well as very many houses, are located on the opposite side of the road to the only footpath, making pedestrian access difficult for people moving about the village on foot, especially for elderly and disabled people; (iv) the railway station and other commercial and residential properties have poor sight lines for access onto the A247 and difficulties in accessing the A247 from these properties will be exacerbated by increased traffic volume (and fewer “gaps” between cars); (v) the A247 is popular with cyclists and because of its narrow and winding nature the potential for accidents that additional traffic will cause is clear.

Policy P2 – My Objections

The Plan states: “4.3.16 National planning policy requires that Green Belt boundaries are only amended in exceptional circumstances and that this must be undertaken as part of the Local Plan process. We consider that exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development.”
The Plan fails to demonstrate that exceptional circumstances exist for each site that is to be taken from the Green Belt. The wording implies that it is legitimate to have a blanket change to Green Belt boundaries to facilitate development. That is not in accord with the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/437  Respondent: 11070113 / Alison Hague  Agent:


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

The Local Plan is not sound.

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

- The changes in this latest version of the Guildford Local Plan show little or no willingness on the part of Guildford Borough Council (GBC) to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and will bring increasing traffic congestion, pressure on other infrastructure, noise and pollution and a reduction in the quality of life of residents.
- The Plan does not consider the implications of Surrey County Council’s (SCC) business plan for Newlands Corner to attract 100,000 more visitors a year. A significant proportion of these can be expected to use the already over-burdened A247 through West Clandon.
- The Plan does not consider the Waverley Borough Council’s approval for the development of 1,800 homes at Dunsfold. This has the potential to feed traffic, which is trying to avoid congestion around Guildford, onto the over-burdened A247 to access the A3.
- Changes to the Plan have done nothing to alleviate the problems (particularly of traffic and congestion) raised in residents’ previous responses. Indeed it is now clear that the problems will be made much worse. There do not appear to be any changes which would be of benefit to the Clandons and indeed the cumulative effect of what is in the Plan and some external factors not in the Plan will have a much worse impact on the A247 through West Clandon and Send than the 2016 draft. Note that the A247 is the only road over, i.e. without a height restriction, the Guildford to Waterloo railway, north east of Guildford, which doesn’t involve travelling through the town centre and for this reason it is already busy.
- The A247 may be an A-road on the map but in reality it is a residential road with numerous side-entrances giving access to residential dwellings, commercial properties, and side roads. The changes to the Plan have done nothing to alleviate, and have likely cumulatively increased traffic on the A247, and hence difficulties that will be caused to residents and visitors to West Clandon and its businesses as they seek to turn on to the A247 from the numerous entrances along the road. If traffic on the A247 was to increase substantially, which seems to be the intention behind the Plan, then this has the potential to create serious difficulties for people accessing the A247 from these side-entrances, whether in a vehicle or on foot. The effect of increased traffic both for pedestrians and people in cars wishing to access the A247 from side entrances along the street would be particularly severe in the section of the A247 from Clandon railway station to the crossroads at the A247/A25 junction, because this is a narrow and winding part of the road accessed by many public and private properties with poor sight lines,
including the Onslow Arms, West Clandon Church car park, Ashley Park care home, Clandon railway station – all of which have exits with extremely poor sight lines (due to humped back bridge, buildings on the edge of the road and entrances being on the crown of a bend). Numerous other properties along the street have similar issues. This is a problem arising from volume of traffic and insufficient gaps to allow safe egress onto the A247.

- The Plan does not address the difficulties of pedestrians either walking on narrow parts of the A247 where lorries habitually mount the pavement, or for pedestrians wishing to cross the A247 in the village of West Clandon. Since there is no room for a footpath on both sides of the road along a significant portion of the length of the A247 through West Clandon, it is not feasible to address the issue of pedestrians wishing to cross the road by providing pedestrian crossings, which would in any case hold up traffic flow. The narrow and winding nature of the road and poor sight lines particularly in the section of the A247 between Clandon railway station and the crossroads at the A247/A25 junction provide particular difficulties for pedestrians needing to cross the road in this section of the A247. Elderly and disabled residents would become increasingly cut-off and isolated by increasing traffic. In addition to the numerous residential properties that would face increasing difficulties for pedestrian access during longer periods of the day, this would also affect the Onslow Arms pub, Ashley Park care home, West Clandon Church car park and Clandon railway station (when accessed from the south) – all of which are at parts of the A247 with a pavement only on the opposite side of the road. To access these places on foot (the railway station from the south) it is necessary to cross the A247. Again, the village of West Clandon does not and cannot have a footpath on both sides of the street in all sections. There are bends, buildings and a humped back bridge which create poor sight lines in several areas. For these reasons, the additional problems that increased traffic promoted by the amended Plan would cause for pedestrians cannot be addressed by pedestrian crossings, even if multiple crossings were deemed acceptable on an A road. This would leave some residents unable to leave their homes for increasingly long periods during the day.

- The A247 through West Clandon already has numerous accident black spots, such as: (i) the exit from Clandon station which has extremely poor sight lines due to a humped back bridge where numerous accidents have occurred; (ii) the exit from the Onslow Arms pub which is almost blind due to the pub building being adjacent the road - a vehicle has recently ended up in the garden of the cottage opposite; (iii) the narrow section outside “Summers” which is regularly littered with the wing mirrors of cars which have made contact, as well as being a dangerous area for pedestrians due to vehicles mounting the pavement to try to pass; (iv) the winding section outside Clandon Regis and near the primary school which regularly suffers from demolition of gate posts and fences as vehicles leave the road; (v) the bend near West Clandon church which has seen damage caused to the flint wall in recent years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/471  Respondent: 11070113 / Alison Hague  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which
overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise, air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/29  Respondent: 11070401 / Vicki Groden  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object re Policy A43 – Land at Garlick’s Arch, Burnt Common and Policy A43a re land for new north facing slip roads to/from A3 at Send Marsh/Burnt Common

1. I object to the late inclusion of this very large development. Does it not require full consultation under Regulation 18.
2. Where is the proof that this amount of industrial space is required, based on the ELNA 2015 and surely Slyfield is a better and already established site.
3. I ask for a re-examination of the real Housing needs and treatment of foreign students in the numbers.
4. I very strongly object to the removal of Send from the Green Belt (Policy P2)
5. I believe that all the local services will be placed under unsustainable strain.
6. The increased traffic flow will severely affect existing residents in terms of volumes, congestion, noise, emissions and change of life of a modest village. Does the standard of life of existing ratepayers not count?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/822  Respondent: 11070401 / Vicki Groden  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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### Land at Clockbarn Nursery, Tannery Lane, Policy A42

I object that Send’s Contribution has been increased at this site with no justification despite a reduction in overall housing numbers in the borough’s plan and the large number of objections to the previous proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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### Land at Burnt Common, London Road, Policy A58

I object to the fact that the employment floorspace which was moved from Garlick’s Arch to Burnt Common has changed from “up to” 7000 sq m to a “minimum of 7000 sq m with a potential for further industrial floorspace to meet future borough needs”. The site at Burnt Common is over 9 ha (over 90,000 sq m). The language of the policy A58 opens this site to unlimited development well beyond what is in the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent:</th>
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I write to register my objection to the planned changes to Send and Send Marsh outlined in the revised Draft Local Plan.

The retention of the Green Belt is, I feel, the most vital issue in the Local Plan. It must not be slackened to allow expansion, but kept to protect the character and rural distinctiveness of the countryside and to keep villages as just that, villages and not large sprawling towns.

I object to the proposals to remove Send from the Green Belt, together with site on the Land lest of Winds Ridge and Send Hill (A44). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for Send or the land to be taken from the Green Belt.
Removing the green belt status from Send serves no purpose other than to facilitate the future development of the village and I strongly object to the proposals. It is not acceptable to set in motion through underhand methods the loss of this valuable, heavily used recreational space that the local populace of all age groups currently enjoy.

The loss of significant swathes of greenbelt land will have a very detrimental impact upon the social, leisure and recreational activities that the local population currently use this land for – football, walks, rambling, dog walking, exercise, usage by young people. In particular young people will have less natural open space and green fields within which to exercise and socialise. At a time when childhood obesity is on the rise, allow the insetting of this land and future development will have a detrimental impact on achieving this objective as vital areas for play and exercise will be lost, impacting upon both child and adult health.

Removing the greenbelt status would jeopardise the habitats of numerous species of wildlife. The fields are home to many wildlife species such as bats, badgers, rabbits and many many more, along with wild plants which should all be protected. The council has a duty to protect woodland and the wildlife under the UK BIO Diversity Action Plan.

The NPPF states that new Green Belt boundaries should only be established in exceptional circumstances, for example when planning for larger scale developments such as new settlements or major urban extensions. If proposing a new Green Belt, local planning authorities should:

- demonstrate why normal planning and development management policies would not be adequate;
- set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;
- show what the consequences of the proposal would be for sustainable development;
- demonstrate the necessity for the Green Belt and its consistency with local plans for adjoining areas;
- and show how the Green Belt would meet the other objectives of the framework.

I question whether the removal of the Green Belt in and around Send has been shown to meet any of the above requirements. There is no evidence presented in the Core Strategy to demonstrate that the proposed strategic extension meets the fundamental aim of Green Belt policy.

The NPPF (para 85, bullet point 6) requires LPAs to define boundaries clearly, using physical features that are readily recognisable and likely to be permanent. The removal of the Green Belt does not relate to any physical features on the ground and does not fulfil this criterion. The lack of physical features against which the proposed boundary is drawn highlights the inappropriateness of the proposed Green Belt removal and the lack of justification for its insetting.

Whilst I wholeheartedly object to the green belt removal plans, should their inclusion in the Local Plan be forced through, the Council must clearly demonstrate that the new boundaries take account of the need to promote sustainable patterns of development as required by paragraph 84 of the NPPF. The Council must review the boundaries of those settlements which would be covered by the Green Belt to ensure that sites are identified for development to achieve their long term sustainability and clearly define the reason for the insetting, fully detailing the future usage of the inset land.

Importantly if the Council chooses to continue with the alteration, it is essential when submitting the Core Strategy for examination that it is considered 'sound' in that it is justified with the plan being the most appropriate strategy, when considered against reasonable alternatives, based on proportionate evidence.

Allowing the removal of Send from the Green Belt, and thereby facilitating the future development of the village, will allow the urban sprawl of Guildford and Woking to further encroach on Send. Send is not a suburb of Guildford or Woking and clear separation should be maintained by the retention of the current Green Belt boundary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The proposed development on Send Hill is within Site of Nature Conservation Interest and is Grade 2 (very good) agricultural land. Access roads leading to the site are already congested, and will be further congested if the proposed A3 entry and exit ramps at Burnt Common are implemented due to the large increase in traffic through the village. This site is not suitable for development.

I urge the council not to consider insetting Send from the Green Belt and set in motion future development of these spaces, but to focus on the numerous unused BROWNFIELD sites that exist throughout the Borough. These would more than meet the current housing demand, once this is properly defined within the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2106   Respondent: 11071553 / Nicholas Roberts   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICIES A36, A37, A38, A39, A40 & A41 (EAST AND WEST HORSLEY) – I especially object on the following grounds:

- The volume of new housing far exceeds local need.
- The impact of these 6 sites on this neighbourhood has not been considered in aggregate. In terms of impact, they are not separate sites.
- The total amount of new building is out of proportion with overall planned development across the borough, and especially excessive when compared with urban areas. As a basic principle, most development under the plan should be in the least sensitive and protected areas.
- The housing density is too high compared with existing development.
- Taken together, these policies would transform the Horsleys into a town, something for which no case is made.
- There is no support locally for this.
- The sites are not sustainable since key infrastructure is lacking and no provision is being made to increase it - eg poor wastewater capacity, lack of schools, absence of traffic management plan, flooding.
- The policies allow too many settlement boundaries to be extended. The Horsleys are irregularly shaped settlements. These policies allow too many boundaries to be squared off so that green fields can be concreted over on the spurious grounds that they don’t contribute to the Green Belt.

- These policies will damage compliance with NPPF 81 by making cycling too dangerous, ruining the rural setting of Waterloo Farm campsite, destroying the setting of Grange Park Opera’s new “Theatre in the Woods” etc.

- The Green Belt gap between the Horsleys and next-door settlements would be greatly narrowed, especially if the Wisley Airfield development is taken into account.

- No account is taken of the impact of Wisley Airfield site on the Horsleys.

- Safe access and egress at Site A40 unachievable, because of flooding, high speed limits, poor sight lines, narrow access to existing properties, the ditch running along the street, poor pavements for the elderly and schoolchildren and the road’s increasing use by recreational cyclists.

- Policy A40 is especially impractical because of high water table and poor drainage, causing regular winter flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4202  Respondent: 11071553 / Nicholas Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A35 (WISLEY AIRFIELD) – I object. The Planning Committee has only recently rejected a planning application for an identical proposal, on 14 separate grounds. It was included in the plan just one day before this happened, showing that this policy is biased in favour of the applicants concerned. It may be no coincidence that these investors had already been given months of extra time to refine their planning application. It is probably also not a coincidence that they have close Conservative Party links with the council. This smells very bad.

The policy fails to present any “exceptional circumstances” for developing this site, which is 85% greenfield, not brownfield as often stated. Other objections include:

- The loss of good agricultural land.

- The excessive housing density involved.

- The fact that over 2,000 houses will swamp and wreck the Ockham conservation area, with harm to listed buildings.

- It disregards the conflict with SCC who also want to use the site for a waste facility.

- It is too near RHS Wisley and Thames Basin Heath SPA and will harm both.

- So will the proposed SANG, which is next to the SPA and would mean dogs and cats disturbing wildlife.

- There is no existing public transport and the train stations are miles away.
- To get there you have to use very narrow, flooded, unlit, winding country lanes with no footpaths or cycle ways.

- This would make the development dependent on private cars (about 3000-4000 of them). But there is no proper data for traffic volumes.

- The extra congestion will certainly make the traffic jams at the A3 roundabout and M25 Junction 10 even worse.

- There will be a dangerous increase in air pollution, as the Wisley Action Group have submitted.

- This is also clay land and the high groundwater table and poor surface drainage not considered either for site itself or for downstream areas in the River Mole basin, which already flood.

- The policy does not consider the major impact on neighbouring villages, especially Horsleys where hundreds of new houses are also proposed. The aggregate impact on infrastructure is not assessed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8839  Respondent: 11071553 / Nicholas Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D1 (BETTER PLACES) – I object. This policy lacks measures to make sure historic and vernacular design guidelines are implemented.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8840  Respondent: 11071553 / Nicholas Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY D2 (SUSTAINABLE DESIGN ETC) – I object because the policy simply cannot be implemented if the countryside is developed with amount of housing as proposed, causing traffic gridlock, infrastructure breakdown and dangerous levels of pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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POLICY D3 (HISTORIC ENVIRONMENT) – I object. This is a manifesto for over-development and the commercial Disneyfication of historic sites. It is trying to “enhance” history, which is futile. It also disregards NPPF paras 126-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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POLICY D4 (DEVELOPMENT IN URBAN AREAS AND INSET VILLAGES) – I object. Despite the need to meet urban demand, regenerate our run-down town and protect the countryside, there isn’t a high enough proportion of new homes planned for urban areas. There’s no encouragement given to expand social housing or genuinely affordable homes. The aims set out for inset villages would be nullified by the excessive level of new housing to be built there. Once again there is too much encouragement for traditional types of shopping that are now out of date.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E1 (EMPLOYMENT) – I object to this policy which seems to be based on shaky and obsolete (pre-referendum) data. We don’t need to encourage low value-added jobs that should go to parts of the country where unemployment is a bigger problem. There’s a lot too much about warehouses, which take up too much space and are not appropriate for Guildford. There’s nothing to protect the rural environment on which many rural businesses depend.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E3 (EMPLOYMENT CAPACITY AND FLOORSPACE) – I object since it will make it harder to use brownfield land for new houses, in breach of government policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E4 (SURREY RESEARCH PARK) – I object. This seems to have been written by Surrey University’s business arm, in their own private interests. Where is the analysis of the cost to Green Belt amenities or services in enlarging the research park? The policy would encourage it to go down-market and become a general business park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY E5 (RURAL ECONOMY) – I object. This could never be implemented if the countryside is urbanised by building so many houses. The policy lists a number of valid rural activities that would be put at risk by the insetting and extension of settlement boundaries proposed elsewhere in the plan. Encouraging town centre uses in rural locations would also ruin village surroundings and goes against both government policy and the expressed wishes of the public.

There should be a much stronger commitment to high speed rural broadband and mobile coverage. It is shocking in the 21st century that these should not be available just a few miles from central London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

POLICY E6 (LEISURE AND VISITOR EXPERIENCE) – I object. The policy doesn’t seem to have a clear idea of what an ideal visitor experience would look like. It should give some examples. Instead, it is meddlesome and dangerous. We don’t need to encourage developers to build “attractions” that ruin our heritage and countryside. Where’s the case for building new ones?

The policy needs to state clearly that Guildford supports the protection of the countryside as its biggest leisure and tourism asset, and define what powers (if any) the council can deploy to influence the market. Given Guildford’s lack of hotels, why is there no policy against closing rural guest accommodation such as Thatchers Hotel in East Horsley?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ) is Sound? ( ) is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E7 (TOWN CENTRE) – I object. It doesn’t state how important rural surroundings and views are to the whole character of Guildford town centre. It doesn’t say anything about the Town Centre Master Plan, GVG proposals or redevelopment plans for the train station.

A major defect is the lack of any list or audit of brownfield sites that could be redeveloped in the town centre. As a result the percentage of total housing planned for the centre is astonishingly low compared with the huge new housing estates the council want to plonk in the countryside. This will only damage and delay the regeneration of the town, which is overdue.

There are no concrete measures to support small, independent shops – and too much encouragement of old-fashioned department stores and chain retailers. These would ruin Guildford centre’s character.

Fortunately, they will never be built because shopping is moving online and the vision of the high street presented in this policy is already obsolete.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8837  Respondent: 11071553 / Nicholas Roberts  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ) is Sound? ( ) is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E8 (DISTRICT CENTRES) – I object to the idea of extending rural shopping centres since this is being used to justify disproportionate housebuilding across the countryside. It would not only spoil the villages but the town’s chances of regeneration. I can’t see any measures here to support the small retailers who are the lifeblood of our villages, even though the council has tools at its disposal, eg the business rates system.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8838  Respondent: 11071553 / Nicholas Roberts  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ) is Sound? ( ) is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E9 (LOCAL CENTRES) – Object. See my comments on E8 above. Extending retailing to areas “adjacent” to rural centres is a Trojan Horse for indiscriminate development generally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8824  Respondent: 11071553 / Nicholas Roberts  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H1 (HOMES FOR ALL) – Object because this policy doesn’t set any limit on building. Again, the housing mix is based on pre-referendum assumptions and a defective SHMA that the public weren’t consulted about and which was never scrutinised by Councillors.

This policy should make Surrey University provide all its students with accommodation by using thousands of planning permissions it already has and by using its existing space more efficiently (eg its half-empty surface car parks). That would free up many units of housing in the best possible place for the very people who need them most.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8825  Respondent: 11071553 / Nicholas Roberts  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY H2 (AFFORDABLE HOMES) – I object. There’s nothing “affordable” about the way these homes are defined. They just mean more development. It also makes it too easy for developers to claim they can’t be built because they’re not commercially “viable”.

If Guildford builds 13,000 new homes it will make zero difference to house prices, so why try to manipulate the market with this policy? Poorer people will have to continue to move to cheaper parts of the country. Is that necessarily a bad thing? Labour mobility is Government policy, not local autarky.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8826  Respondent: 11071553 / Nicholas Roberts  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H3 (RURAL EXCEPTION HOMES) – I object. It shouldn’t allow developers to abuse the system by building “market housing”, especially as this reduces Green Belt protections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8843  Respondent: 11071553 / Nicholas Roberts  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY I1 (INFRASTRUCTURE & DELIVERY) – I object. Adequate infrastructure should be a precondition of the whole plan, not a footnote buried away deep in the plan as it is here. This policy can’t hide that there are no funds of plans for the infrastructure needed to support the overambitious plans for big housing estates spread across the Guildford Green Belt.

Why not spare the countryside and build in town instead? I just don’t believe that not enough brownfield urban sites exist. First of all because the council hasn’t bothered to catalogue it. Secondly because this policy does nothing to prioritise its use through the CIL structure.

Developing brownfield sites is so much easier and cheaper for the public because much of the infrastructure already exists. But this policy kow-tows to developers who find green fields cheaper.
There are no contingency plans here for the traffic increase caused by the planned thousands of houses across the countryside. Because housing and road planning are sequenced back to front, Green Belt will be lost before road are improved – if indeed they ever are, since there is no funding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8844     Respondent: 11071553 / Nicholas Roberts     Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY I2 (SUPPORTING DTP’S ROAD STRATEGY) – I object since it doesn’t allow for the disastrous increase in traffic that will come from excessive development in the countryside. Green Belt will be lost before road improvements come about, making this policy also out of sequence with the Dept for Transport’s strategy. The road improvements are unlikely to happen anyway after Brexit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8845     Respondent: 11071553 / Nicholas Roberts     Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY I3 (SUSTAINABLE TRANSPORT) – I object to this pious and overoptimistic list of measures. They are just not rooted in the realities of living in Guildford. Sustainability should set a limit on development – not (as here) assume that it can be magicked up to support excessive housebuilding.

The assumptions about walking and cycling are totally unrealistic. These modes of travel will not be used by most of Guildford’s population. Many are increasingly pressed for time, old, frail and obese. Others are too young, unwell or carrying heavy loads.

Not enough attention is given to transport in the countryside, where there is little public transport and no chance of funding its expansion. It disregards the poor state of our roads (the worst county in the country) and the additional problems that will be caused by excessive housebuilding in the countryside.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY I4 (GREEN & BLUE INFRASTRUCTURE) – I object, since it can’t be enforced and is anyway contradicted by excessive planned housebuilding in the Green Belt. It does not evaluate the cost of losing Green Belt land and the benefits this currently provides (listed under Policy P2 above).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P2 (GREEN BELT) – I object very strongly. This policy should start by stating the council’s support for the Green Belt, in line with the NPPF, statements by Ministers and its own election manifesto commitments. It should then make a fair and balanced assessment of the Green Belt’s positive importance to Guildford as an asset providing amenities and services to the public and to private individuals alike. This would allow planners in future to evaluate the cost of development proposals in terms of the damage to natural heritage, views and landmarks, farm production, leisure and tourism, biodiversity, flood control, water catchment, carbon sink capacity, public health and wellbeing, public open spaces (eg parks, SANG, burial grounds, recycling areas), mineral extraction, other rural businesses etc, etc…

The amount of new building planned to be located in the Green Belt is beyond all reason. It’s out of proportion with the relatively minor amount destined for the urban areas, where most people would prefer to live. It discriminates against the less well-off by dumping them in remote ghettos in the countryside where there are no jobs, no transport and no social infrastructure. It discriminates against rural residents who’ll have their environment ruined. Actually, it even discriminates against town dwellers who will never see Guildford regenerated.

2000 residents made all this clear in the last consultation and the Conservatives promised to protect the Green Belt, but this plan is a major assault on it, just like the last version, piloted by the infamous Monika Juneja. Nothing has changed.
Why can’t the urban and rural settlements simply adopt new development in proportion to their size? That would mean Guildford town accommodating 20 times the number of new homes compared with the next biggest settlement, East Horsley. People would accept that.

I find it offensive for councillors to say that there is a percentage of Green Belt that should be “sacrificed” to development when this isn’t necessary. It doesn’t matter what the percentage is – this approach isn’t supported by any government policy. We’re being told we can’t stand in the way of progress. That’s what they said about asbestos – and Communism.

Who says Guildford’s rural villages don’t contribute to the “openness” of the countryside and should be “inset” (ie kicked out)? Only the consultants that some unauthorised civil servant hired to draw up the defective Green Belt and Countryside Study, which has never even been vetted by councillors. It’s all too subjective as a basis on which to wreck the lives of thousands of rural residents.

This policy doesn’t refer at all to the requirements in NPPF para.17 and the effects that major development in the Green Belt would have in this regard.

Any impartial observer can see that removing most of the villages from the Green Belt is a very dubious move, especially given the lower economic and population growth following Brexit.

Village settlement boundaries would be extended in a major way, allowing great blocks of house building on green fields and changing forever the rural character of our villages. There is no argumentation or case made in the plan for doing this, and it is unjustified.

As a young resident (23) I don’t want my heritage sold off by people who won’t live long enough to see the consequences. The Green Belt has survived several generations already and should continue to be protected down the ages. The council has misjudged young voters like me if it thinks a vain attempt to manipulate short-term house prices is going to win our support.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>POLICY P4 (FLOOD RISK AND WATER PROTECTION) – I object because it limits stops hardstanding sites in town being developed.</td>
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<td>POLICY P5 (THAMES BASIN HEATH S.P.A.) – I object. The compensation proposed isn’t significant enough to provide the protection needed. Encouraging SANG sites merely helps developers put new housing nearby. It does nothing to improve the natural environment that exists already and is counter-productive.</td>
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POLICY S1 (SUSTAINABLE DEVELOPMENT) – I object, since it doesn’t define what it understands sustainable development to mean, doesn’t peg this to the NPPF’s Core Planning Principles and doesn’t give decision-makers any guidance for applying it in practice to planning matters. It fails to say how economic, social and environmental impacts should be balanced. Amazingly, it doesn’t even mention the Green Belt, the most important example of sustainable development policy in Guildford, and it doesn’t undertake to protect it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8823  Respondent: 11071553 / Nicholas Roberts  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

POLICY S2 (BOROUGH-WIDE STRATEGY) – I object, since the EU referendum has now throw all the growth and population assumptions up in the air. The council doesn’t tell us how the housing figure has been worked out because it doesn’t know itself: the formula is protected by private intellectual property. So the plan can’t show it’s objective. We are nevertheless told that the 13,860 figure is an “objectively assessed number”. It isn’t, as Cllr David Reeve has demonstrated beyond doubt.

Even if the OAN were objective, it cannot be the same as a housing target, which by definition is not objective but is a policy intention. We just aren’t told how many houses the council plan to build, taking all the usual constraints such as the Green Belt into account. This isn’t a plan: we are instead being asked to give the council a blank cheque to build however many houses it decides.

Why are you using an artificial Housing Market Area that’s much too small? This ignores next-door districts that thousands of people travel to and from on a daily basis for work, shopping and study. Just because it’s been used before doesn’t make so-called West Surrey (Woking, Waverley and Guildford) a market area in real life. If it were Rushmoor, Mole Valley and Guildford instead, the numbers would be different.

13,000 is far too many: they would turn us into an urban extension of London, like Croydon. Why does Guildford have to build twice as many large new housing estates as the rest of the county put together?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/614  Respondent: 11071553 / Nicholas Roberts  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
The following comments relate to my local area that features in Sites A36-41 (East and West Horsley):

- The latest version of the plan reduces the number of development sites here by 2, but 4 remain, representing 395 new homes. This is too many in absolute terms, and disproportionate in relation to the rest of the borough. In my view, the plan is unsound in failing to assess the aggregate impact of these sites, along with the 2,000 homes planned for Site A35 only 2 miles away, in effect leaving the Horsleys as vulnerable to piecemeal planning applications as they are without a local plan in place. By not setting any development boundaries, the “plan” fails to plan this important part of the borough’s future size or shape in a useful or meaningful way.

- The inspector needs to be aware that Horsley residents believe this is the result of political bias on the part of a Council leadership overwhelmingly representing the other end of the borough, who wish to push development away from their own wards.

- The plan fails to mention most of the known sustainability and infrastructure problems affecting the Horsley sites, which were fully explained in the public responses to the 2016 consultation. These include public transport, traffic, road safety, parking, schooling, medical facilities, sewage, flooding/surface drainage and shops.

- The density of new housing on the four Horsley sites is too high, being greater than anywhere in the locality at present.

- Sites on the edge of existing development in the Horsleys trespass on surrounding open countryside and require big extensions in settlement boundaries. The plan presents no arguments for this which, contrary to NPPF paragraph 79, will promote creeping urbanisation by squeezing the corridors separating the Horsleys from next-door settlements – one of the main reasons the Green Belt exists.

- Taken together, the 4 Horsley sites conflict with NPPF para. 81’s encouragement of access to the Green Belt and its amenity and recreation value. This has been an outstanding success story in the Horsleys, as detailed in response to the last consultation. Assets include a dense public footpath network, parish parks, sports fields, a campsite of international standard, Britain’s newest rural opera theatre (opened this summer) and the popular Olympic cycle route. In order to survive, these assets require a local plan that protects the Green Belt, maintains its openness and beauty and avoids urbanisation and traffic congestion. Sites A35-41 are inimical to this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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The council plans for the town and employment (E1 & E2) take no account of modern trends highlighted in previous consultations. The public seem better informed than the council and its consultants about these. The council want to waste space with low-value and land-hungry enterprises, such as warehouses, that employ few people and just add to heavy traffic, ignoring Guildford’s comparative economic advantages of a well-educated labour force and location for high-value businesses, which will therefore go elsewhere. They also want to fill the town with shops, ignoring the general global trend away from town-centre shopping and the opportunity to regenerate the decaying town centre with low-cost housing, as has happened in central London. The plan fails to
make any arguments for putting commercial development instead on green-field sites such as Burnt Common, which is introduced for the first time in this version of the plan without any supporting rationale.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: pslp171/2376</th>
<th>Respondent: 11071553 / Nicholas Roberts</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire):()

- The council plans for the town and employment (E1 & E2) take no account of modern trends highlighted in previous consultations. The public seem better informed than the council and its consultants about these. The council want to waste space with low-value and land-hungry enterprises, such as warehouses, that employ few people and just add to heavy traffic, ignoring Guildford’s comparative economic advantages of a well-educated labour force and location for high-value businesses, which will therefore go elsewhere. They also want to fill the town with shops, ignoring the general global trend away from town-centre shopping and the opportunity to regenerate the decaying town centre with low-cost housing, as has happened in central London. The plan fails to make any arguments for putting commercial development instead on green-field sites such as Burnt Common, which is introduced for the first time in this version of the plan without any supporting rationale.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire):()

- Policy H1 has deleted constraints on housing density, which ought to be a key part of any planning document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<p>| Comment ID: pslp171/2372 | Respondent: 11071553 / Nicholas Roberts | Agent: |</p>
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  - P1 and E5 have removed the 5 tests for development in the AONB, making it more vulnerable to development, in contradiction to government policy and promises made by the council leadership since the 2016 consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: pslp171/2373  Respondent: 11071553 / Nicholas Roberts  Agent:</th>
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  - The plan still contains a multi-pronged assault on the Green Belt. It is often assumed that young people like me prioritise building new homes over the countryside and that Green Belt protection is just an issue for NIMBYs. I’d like to point out that concreting over the whole of Guildford borough would have zero effect on house prices, since it would make no impact on the national supply/demand balance, the local overhang from London or the availability of cheap credit, e.g. to overseas buyers. On the contrary, it would disincentivise the regeneration of urban areas where young professionals like me want to live (while damaging the natural environment that matters more to my generation than that of our borough councillors). If the Guildford local plan wants to put 70% of new
homes on green fields, therefore, the onus should be on the council to explain why – why some of the biggest proposed developments are on remote Green Belt sites rather than in places with existing infrastructure and amenities, what “exceptional circumstances” justify this under the NPPF, why most of the borough’s rural villages need to be taken out of the Green Belt, why so many apparently random infills and settlement boundary extensions are proposed in the countryside, and why there is no Policy that systematically evaluates the alternative – the use of urban, brownfield sites. The plan’s silence on these issues is one of its biggest flaws.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/427  Respondent: 11071553 / Nicholas Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

- The arithmetic behind the housing numbers in the SHMA remains a complete mystery and can’t be tested by either the public or the government because the council refuses to reveal it. The mistakes in the SHMA have been amply explained in at least 2 independent studies which the inspector will have seen, but the SHMA methodology is still taken by the council to produce an “objective” housing number assessment. This has been lifted wholesale into the plan as a policy proposal, when it is merely part of the evidence base and should be assessed and debated critically and transparently. I suspect this would produce a target about 60% lower than the 12,000+ proposed and would immediately solve a lot of objections about building on the green belt etc. I also don’t think the inspector should trust the figures as a fixed target, given the council’s contradictory noises about how development will be phased and infrastructure and other constraints applied. This leaves the final housing number so up in the air as to render this part of the plan useless as a practical policy tool for officers responsible for day-to-day planning. No-one knows for sure what number the council is heading towards or how this aligns with public opinion or government policy. This cannot be deemed “sound”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/428  Respondent: 11071553 / Nicholas Roberts  Agent:


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4347 Respondent: 11071649 / Martin Southcott Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I believe that the Objectively Assessed Need figure of 693 homes per annum for future housing is excessive and based on flawed calculations within the SHMA, as highlighted by DRA’s independant consultants.

Guildford's OAN should also, like all other Council's in Surrey, take account of constraints. For Guildford, inherent constraints include:

the lack of infrastructure (particularly transport infrastructure) affecting road travel and causing serious congestion within the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17746 Respondent: 11071649 / Martin Southcott Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am fully supportive of the responses submitted by the Guildford Residents Association about the above.

I wish to emphasise my concern about:

the lack of suitable infrastructure for the massive increase in housing and town expansion proposed. Current infrastructure is already woefully inadequate, and the provision of new should be binding and phased in advance of expansion. I strongly support the concept and full investigation of the GVG’s additional bridge over river and railway. Any new station development must address this.

the risk of flooding in a large number of key areas of the Borough

Protected wildlife areas

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17749  Respondent: 11071649 / Martin Southcott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Landscape areas

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17748  Respondent: 11071649 / Martin Southcott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

the large amount of Green Belt land within Guildford Borough, which limits the amount of available land for development (see below)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>the proposal to use green belt land for so much of the housing when brownfield possibilities have not been fully explored and used first.</td>
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<td>I am shocked by GBC's withholding of key data of vital public interest.</td>
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<td>The Local plan should rightly reflect the Town Plan, but also address its many flaws eg an unrealistic 40% expansion of retail.</td>
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I strongly oppose the submission local plan as it currently stands, but believe that it can be made suitable if changes are made to fully address my concerns and the more detailed concerns of the GRA response.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2548  
Respondent: 11071649 / Martin Southcott  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I believe that the evidence used for population growth (an OAN of 12,426) is incorrect, giving a major overestimate of likely future housing needs. This is in part due to under-recording of students leaving after finishing their studies and due to an unacceptably low proposal of the proportion of students who should be accommodated on campus.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2972  
Respondent: 11074465 / Louise Vaughan  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. APPENDIX C

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the Plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43), which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2971  
Respondent: 11074465 / Louise Vaughan  
Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this Plan without regard to Green Belt, infrastructure, or other constraints. The Plan says that “allocating these sites does not grant planning permission for development”. However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council has received about individual sites ever since the Issues and Options consultation in 2013. The Plan has hardly changed since the Council received 20,000 objections to its first draft in 2014. The Inspector considering the Plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition, since it was produced the EU referendum decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as well as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt, as well as infrastructure (most notable roads) considerations, all represented constraints that should have been taken into account in determining the final housing number. Accordingly in this regard my objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly, I believe the Council did not properly consider constraints and that its decision-making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt, then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances that are argued in favour of development at that particular site. There is no evidence this has been done. Instead the Council has appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Answer (if comment is on questions 1-7 of the questionnaire): ()

1. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year, and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to:
  - Failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability, and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is, I believe, inaccurate. It inflates the needs of the borough by distorted student numbers and is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6060  Respondent: 11074465 / Louise Vaughan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY A25 - Gosden Hill Farm

I OBJECT to Policy A25 with proposals for Gosden Hill Farm

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development
proceeds I believe the narrow strip of Green Belt remaining between Guildford and West Clandon at this point will be too narrow and will come under further pressure for development.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch, give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used, and is recognised by borough and county councils as being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data:

- Clandon cross roads area to Bulls Head pub - 17 incidents
- Bulls Head pub to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015:

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays - Surrey Fire and Rescue deployed

2016:

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burnt Common and M25 J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 June 2016 Motorcyclists with injuries airlifted to hospital - Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Green Belt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space, and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on it will be very difficult to construct a tunnel.
The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement every day and through Send and Ripley, which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is gridlocked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size. Electricity supply is also inadequate and would require infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/6061</th>
<th>Respondent: 11074465 / Louise Vaughan</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **POLICY A43 AND A43a – Garlick’s Arch**

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council may have been influenced by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sqm of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to make the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site?

There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.
National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream that runs through the site is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that could be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which is protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hour, no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition of north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking would be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 would go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12390  Respondent: 11074465 / Louise Vaughan  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.
The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**POLICY D3**

1. I OBJECT to Policy D3 - Historic environment

I object to this Policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**1. POLICY D4**

I OBJECT to Policy D4 - Development in urban areas and inset villages

The Policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The Policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this Policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12387  Respondent: 11074465 / Louise Vaughan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ()

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E1

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location, remote from any facilities of any kind, and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development. The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site. The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12388  Respondent: 11074465 / Louise Vaughan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12389  Respondent: 11074465 / Louise Vaughan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E5

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12404  Respondent: 11074465 / Louise Vaughan  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience

The Policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable, (for example the new Opera House at West Horsley Place), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the Policy should recognise that in many rural areas, new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example, the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this Policy the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors numbers do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this Policy the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead the Plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the Plan needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.
4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12396  Respondent: 11074465 / Louise Vaughan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
1. **POLICY E7**

I OBJECT to Policy E7 Guildford Town Centre

The Policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the vision wording is effectively of little or any force. These principles should be included in the formal Policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The Policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The Policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings, or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The Policy also fails to provide guidance on design requirements, as required by the NPPF.

The Policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The Policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/12394  **Respondent:** 11074465 / Louise Vaughan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **POLICY H1**

I OBJECT to Policy H1 – Homes for all

Numbers aside, all the Policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections, and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/12395  **Respondent:** 11074465 / Louise Vaughan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY H2**

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.
It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12402  Respondent: 11074465 / Louise Vaughan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes as this is a Trojan horse policy

It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This Policy means building anywhere and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the Policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. If the housing would meet identified need and adjoins a settlement under this Policy, permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available. The Policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The Policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.
The Policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the Policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The Policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance, school children are expected to walk further than that before being eligible for free school travel.

The wording of the Policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. For example, housing could be built for retired Cabinet Ministers under this Policy so long as the first tenant was required to have a local connection. The introduction to the Policy mentions this point, but it is not part of the Policy itself, and may carry little weight at appeal.

The blue-box Policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12391  Respondent: 11074465 / Louise Vaughan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY II

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy II)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.
With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists pass through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon, The Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements, as they have to do to pass at narrow sections.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green Belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

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The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon, The Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements, as they have to do to pass at narrow sections.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green Belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritising greenfield over urban, brownfield regeneration, the Plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This Plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognising this as a key constraint, the Plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways. Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send, will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12392  Respondent: 11074465 / Louise Vaughan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY I2

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this Policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft Plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12393  Respondent: 11074465 / Louise Vaughan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **POLICY I3**

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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1. **POLICY P2**

I OBJECT to not protecting the Green Belt (Policy P2)

This Policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is...
the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough). I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this Policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This Policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch so there is no evidence base to support including this site. Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12385</th>
<th>Respondent: 11074465 / Louise Vaughan</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>1. POLICY P4</th>
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<tbody>
<tr>
<td>I OBJECT to development in areas that are at risk of flooding (Policy P4)</td>
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</table>

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/12380</th>
<th>Respondent: 11074465 / Louise Vaughan</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>1. POLICY S1</th>
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<tr>
<td>I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)</td>
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The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The Policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The Policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognise that economic growth, social justice and environmental protection often conflict. The Policy
does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The Policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this Policy virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long-term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this Policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This Policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and West Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12382  Respondent: 11074465 / Louise Vaughan  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **POLICY S2**

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA); the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.
It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general, and this policy in particular, does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: SQLP16/1470</th>
<th>Respondent: 11074465 / Louise Vaughan</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy, which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.
2. SHMA figures, which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.
3. The recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1471  Respondent: 11074465 / Louise Vaughan  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

   1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

   2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

   3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

   4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.
5. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
6. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
7. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
8. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
9. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
10. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
11. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
12. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
13. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
14. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
15. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
16. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
17. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
18. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
19. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: SQLP16/1473</th>
<th>Respondent: 11074465 / Louise Vaughan</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): (No)</td>
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I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is
stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.

7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).

8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4453  Respondent: 11074465 / Louise Vaughan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsustainable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the
neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.
24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ()

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately
half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2882  Respondent: 11074465 / Louise Vaughan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/551  Respondent: 11074465 / Louise Vaughan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1581  Respondent: 11074561 / Tim Anderson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.
The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY A25 - Gosden Hill Farm

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarns Lane to Portsmouth Road Birch Close - 8 incidents
2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital  Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until the A3 reaches the A320 Stock Road.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.
The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPS16/3010 | Respondent: | 11074561 / Tim Anderson | Agent: |
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Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY A43 AND A43a – Garlick’s Arch

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase
when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)
The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved. This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY D3

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6502  Respondent: 11074561 / Tim Anderson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6488  Respondent: 11074561 / Tim Anderson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **POLICY E1**

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/6490  **Respondent:** 11074561 / Tim Anderson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY E2**

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.
There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. POLICY E5

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For
example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for “overdevelopment”/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6496  Respondent: 11074561 / Tim Anderson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.
It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY H2**

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY I1

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable...
(and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6494  Respondent: 11074561 / Tim Anderson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY I2

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).
Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6495  Respondent: 11074561 / Tim Anderson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions I-7 of the questionnaire): ()

1. POLICY I3

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6486  Respondent: 11074561 / Tim Anderson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions I-7 of the questionnaire): ()
1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.
This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6507  Respondent: 11074561 / Tim Anderson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### 1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.
The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Questions posed by Guildford Borough Council as part of its consultation.

24.A. Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

ANSWER

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24.B. Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant? Please provide the following information being as precise as possible:

- why you consider it is or is not legally compliant and
- what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1019  Respondent: 11074561 / Tim Anderson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24.C. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

ANSWER
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. I do not believe the draft plan accords with the NPPF policies on protecting the Green Belt.
14. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not itself a very special circumstance justifying an indiscriminate removal of sites from the Green Belt. Having properly calculated a housing needs number, constraints should be applied to it to reflect the Green Belt and AONB. Each proposed Green Belt site then needs to be considered on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances, and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt, can the proposal proceed. The draft plan does not demonstrate that this has been done. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
15. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
16. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
24.D. Question 4: Duty to cooperate

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

- why you consider it has or has not complied with the Duty to cooperate and
- what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have carefully considered the Proposed Submission Local Plan which Guildford Borough Council has published for public consultation.

My comments are set out below.

1. The Proposed Submission Local Plan includes the statement “We will continue to protect the Metropolitan Green Belt” however GBC appears to be in breach of this same policy as some 65% of developments will be made on land that is currently Green Belt.

2. I do not agree with the scale of the house building programme which is being proposed by GBC. The target outlined represents a 25% increase in the housing stock of the borough. The Office of National Statistics projects a population increase of some 15% for Guildford Borough over this same period.

3. I am also concerned that the infrastructure proposals are inadequate even to meet the needs of what is there at the moment, let alone the proposed developments in the Local Plan.

I therefore OBJECT to the Proposed Submission Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: letter gbc 290616.doc (26 KB)
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A43 - Proposed development at Garlicks Arch

I object to the proposed development for the following reasons:

- This area is Green Belt land. Government guidelines state that this should only be built on in exceptional circumstances. An exceptional need for this huge proposed development has not been demonstrated.
- The location is completely unsuitable for a development of any size, as no transport infrastructure exists apart from the local roads, which are already up to capacity. All that would result would be gridlock from the huge number of additional cars caused by a new development, as well as the increase in danger to local children and families from the extra vehicles and resulting increase in air pollution.
- Local schools and medical services are already oversubscribed. A new development would further exacerbate the traffic problems as people are forced to travel further afield to access these and other services.
- Electrical, telecoms and sewerage infrastructure in this area are not capable of supporting a development of this size.
- The ancient wooded area that would be destroyed is important and extensive, and irreplaceable flora and fauna would be wiped out.

To summarise: a development of any scale in this location is completely inappropriate, and would serve only to produce homes that would make no contribution to the community, as it would worsen the quality of life for all concerned.

I object to this development and ask that the application be rejected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to this development and ask that the application be rejected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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POLICY A44 - Proposed Development on Send Hill

I object to the proposed development for the following reasons:

- This area is Green Belt land. Government guidelines state that this should only be built on in exceptional circumstances. An exceptional need for this development has not been demonstrated.

- The land is registered as having been used for landfill in the past and its contents are unknown. Any excavation is a potential health risk to local residents and wildlife, and could result in contamination of neighbouring farmland.

- The road is a narrow country lane, and any increase in traffic cannot be justified. This would inevitably increase pollution and traffic hazards for local families.

- The wooded area that would be destroyed is long-established, and flora and fauna would be wiped out or displaced.

- Whilst the community is aware of the Council’s obligation to provide sites for travellers within the borough, the access to Send Hill from Potters Lane is steep and narrow, and this location is wholly unsuited for vans, caravans and trailers.

- This is a popular area for walkers, and as no footpath exists, would substantially increase the dangers from traffic for people on foot.

- The other access to Send Hill from the village passes St. Bede’s School, which is already a bottle neck at busy times. More traffic increases air pollution and the risk of collision for children attending this school, and also for Send First School in nearby Send Barns Lane.

- The sewer infrastructure on Send Hill is already under strain. Adding so many new houses in this location, where the only outflow is down the hill towards the village, would push it to breaking point.

- Telecoms and electrical services and plant are also inadequate for a development of this size in this location. Upgrading would involve excavation of the road or verge the entire length of Send Hill, as no services of these types exist at Potters Lane. I assume the developers would not be obliged to make reparations to the local residents for the noise, disruption and inconvenience, assuming the works were even carried out.

To summarise: health, environmental and ecological considerations are compelling on their own. The simple fact is that this development would result in homes that would be unfit for purpose. They would make no contribution to the community, as their only function would be to make life worse for all residents of Send Hill in particular, and Send in
I object to this development and ask that the application be rejected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:  pslp172/3529</th>
<th>Respondent:  11077025 / David Williamson</th>
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<tr>
<td>Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A42 change for the following reasons:
- The 33% increase from 45 to 60 homes is excessive
- This flies in the face of hundreds of objections already made by local residents
- It will only worsen traffic congestion, air pollution and dangers to residents and their families in Send, Tannery Lane and at the A247 junction
- It will set a precedent for further erosion of Green Belt in the village and surrounding areas

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:  pslp172/3530</th>
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<td>Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43 change for the following reasons:
- No ‘exceptional circumstances’ to justify this use of Green Belt land exist
- It ignores the thousands of previous objections already made by local residents
- The site is ancient woodland from the time of Queen Elizabeth 1 and cannot be replaced
- The development would effectively join up the villages of Send and Ripley, defeating the very purpose of Green Belt land
- It is currently a Zone 2 Flood area and development will make matters considerably worse
- It will generate massive amounts of additional traffic that the local road network simply cannot cope with

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A58 change for the following reasons:
- It was deleted from the 2014 draft as a direct result of the huge number of objections made previously
- The parameters of allocation of land for industrial or warehousing use has changed from "a maximum of 7,000 sq m" to "a minimum of 7,000 sq m" in the 2016 plan
- Slyfield and Guildford still have empty sites and units. There is no need for this development in the middle of Green Belt land
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for the whole borough
- Hence, an allocation of over 10 hectares just at Send in Green Belt land is utterly unnecessary
- The increase in heavy traffic would cause gridlock on local roads, and an increase in air pollution and danger to local residents and children

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>pslp171/1735</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposal to inset Send Business Park from the Green Belt for the following reasons:

- It is an old site that should not be further developed because of its location within Green Belt land on the Wey Navigation
- The road network is narrow and restricted, and totally unable to service any new expansion
- Road links to the A3 and elsewhere go directly through the village, which would increase traffic pollution and danger to local residents and children

To summarise, all these developments in Green Belt land have attracted many thousands of objections from local residents - they are not wanted, but more importantly, they are simply not needed. There are many brown field sites throughout the borough that have not been taken advantage of, only because they would not yield as good a profit for developers.

Housing is needed, but it must be built in the right places, not just the most convenient or most profitable, and be accompanied with investment in local services for the huge increase in numbers of people that would come along with the proposed construction. The real tragedy is that were these developments in Send, Send Marsh and Burnt Common allowed to go ahead, the quality of life for existing and new residents alike would be much poorer than it is now. Local roads, schools and medical facilities are already fully stretched. There would be a considerable human cost for hitting government targets.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/285  **Respondent:** 11077313 / Samantha Crone  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

In particular the proposed development of green belt sites in and around the village of East and West Horsley.

I would like to express the following objections and concerns:

- This would involve building on green belt land which is protected from development by national legislation. Exceptional circumstances must exist for development of this land to be justified. No exceptional circumstances have been demonstrated.

- Loss of green belt land will increase the risk and extent of localised flooding by decreasing the ability of surface water to drain away. The changes in our climate, as we have recently witnessed, have meant an increase in rainfall and flooding. Decreasing the ability of surface water to drain away by building on green belt land will exacerbate this problem.

- In particular, the houses in Nightingale Avenue and Nightingale Crescent, West Horsley, will be at high risk of flooding if the proposed development goes ahead. Due to the incline of the land, surface water naturally drains onto the land proposed for development at the rear of Ockham Road North.
• Flooding in this location would be further increased by sewage overflow problems, which are already an issue in the Ockham Road North/Green Lane area. The proposed development would increase the volume of sewage in the sewer network resulting in a serious capacity issue.

• Such a rapid large increase in population density in East and West Horsley cannot be supported by the current infrastructure or amenities.

1. The local schools are at full capacity. The village primary school, The Raleigh School, is already heavily oversubscribed and cannot fully accommodate the existing number of children in the village.

1. The village medical practice would also be unable to cope as it is already very busy and difficult to get an appointment.

1. Parking in the village is currently difficult. The proposed development would worsen the situation.

1. The existing narrow roads cannot cope with the increase in volume of traffic which would be inevitable with such a population increase.

1. The current traffic on the A3 is very congested, particularly at peak times, as is the M25 around the A3 junction. The proposed development can only exacerbate these problems as there is very little industry or businesses in the immediate vicinity and residents of the development will have to travel to work, or at least travel to the nearest railway station, which themselves have inadequate parking for current usage levels.

• Such a large increase in population density in a small village would drastically change the character of the village and has not been demonstrated to be necessary or desirable for this location.

In considering these objections I would be grateful if you could answer the following questions:

What special circumstances exist to justify building on green belt land in this instance?

What is the justification for such a large increase in population density in the small village of Horsley?

What provisions would be made for schooling, medical care and other such essential services and amenities?

What changes would be made to the infrastructure to accommodate these developments?

Would more green belt land be destroyed for access roads and/or facilities to be put in place?

What would be done to address the issue of flooding which would be increased due to loss of drainage onto green land and an increase in sewage in the sewer network?

What are the proposals to address the issues of increased traffic and congestion?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Increased housing

The plan to place 35% more homes in Horsley will impose an unsupportable burden on the infrastructure, schools, road network, medical services, shopping, parking and public transport. The local services are already very stretched. The drainage is also a concern as the network is unlikely to be able to support this increased housing developments.

The increased density for West Horsley will dramatically change the character of the village and the increase in extra cars will block the roads and parking will be a massive concern.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<tr>
<th>Comment ID:</th>
<th>PSLPS16/6298</th>
<th>Respondent:</th>
<th>11077473 / Helen Austin</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

### Wisley Airfield

The proposal for 2000 houses proposed for Wisley Airfield site has been refused by the Planning Committee 2016. This proposal remains on the Guildford plan. The removal of more Green Belt in order to build is a huge concern. The increased use of highways together with the problems of the infrastructure within Horsley not being capable of withstanding the increased numbers this would inevitably be a worrying threat in both the short and the long term.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID:</th>
<th>PSLPP16/13150</th>
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<th>11077473 / Helen Austin</th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The proposed plan does not protect the Green Belt and 65% of the proposed new developments will be placed on land that is currently Green Belt. According to the National Planning Policy Framework para 87, it is stated that ‘As with previous Green belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances’. The housing need has already been turned down as an exceptional circumstance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1873  Respondent: 11078081 / Karen Lee  Agent:

<table>
<thead>
<tr>
<th>Document:</th>
<th>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</th>
</tr>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My objections to your proposal to build so many houses in the Horsley area are:

The houses are not going to be affordable for our young people to buy and that is our only need in this area is one and two bedroom houses, flats and bungalows for our elderly, I do not want the Raleigh school to move and to be rebuilt, I do not want the Raleigh school to get any bigger. I want the Horsleys to stay in the green belt.

You don’t take into consideration the extra traffic and air pollution, you don’t seem to care about ripping out hedges and felling trees and woods. You don’t care about our wildlife that need all of these things just to try and survive these days is a struggle for them. These are my reasons to saying no to this development in my area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3295  Respondent: 11078337 / Giselle Hampton  Agent:

<table>
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<tr>
<th>Document:</th>
<th>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We are vehemently opposed to any changes to the current Green Belt and to the proposals identified in this letter which radically alter the character and nature of existing settlements, increase the pressure on already stretched local infrastructure or create entirely new developments in current rural locations effectively “urbanising” existing countryside.

Specifically we reject the whole concept of “inset” villages. If villages are currently "washed over" by the Green Belt, they should remain in the Green Belt and their settlement boundaries should remain unaltered to preserve their current character. We also object very strongly to any suggestion that a wholly new development should be permitted at the former Wisley Airfield site. This development would create massive challenges to surrounding roads and infrastructure and would be completely out of keeping with the rural nature of the surrounding countryside and be a massive encroachment into the openness of the existing Green Belt south of the 43. More generally, the focus on the three new strategic sites to the north of Guildford on either side of the 43 (up to 5,100 dwellings) and the numerous "inset-facilitated" developments in the Horsleys, Send and Ripley (up to 991 dwellings) effectively creates an urbanised corridor which radically alters the character of the Borough and should be rejected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

We strongly object to the following specific policies on which we feel able to comment due to their proximity to our home and our use of local facilities, infrastructure and countryside.

- Policy A35 - former Wisley Airfield
- Policy 436 - Hotel, Guildford Road, East Horsley
- Policy A37 - Bell and Colvill, Epsom Road, West Horsley
- Policy A38 - Land to west of West Horsley
- Policy A39 - Land near Horsley railway station
- Policy A40 - land to the north of West Horsley
- Policy A41 - Land to the South of Horsley
- Policy A42 - Clockbarn Nursery, Send
- Policy A43 - Land at Garlick's Arch, Send Marsh/Burnt Common and Ripley
- Policy A45 - Land at Rear of the Talbot, Ripley

As indicated above in totality these Policies create an undesirable level of increased development in essentially rural areas and small local centres.

Individually none of the above policies should be contemplated if a pre-requisite for approval is removal of the identified sites from the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/6438  Respondent: 11078337 / Giselle Hampton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The very fact that the Plan has identified major highway improvement requirements and the necessity of a significant public transport bus service on wholly inadequate rural roads indicates the complete impracticality of this proposal. The infrastructure works that will occur as a result of the Wisley airfield site development indicate the disruptive and inappropriate nature of this proposal.

The A3/M25 section of highway is already heavily congested at peak times. The increased traffic levels arising from the proposed development would be intolerable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6443  Respondent: 11078337 / Giselle Hampton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We are adamantly opposed to this proposal. The creation of what is effectively a new town in the middle of the Green Belt close to existing heathland and extensive open space is completely contrary to everything that the Green Belt stands for. The scale of the proposed project is massively disproportionate and as already pointed out will place severe burdens on road infrastructure.

The inevitable traffic increase will completely change the nature and character of Ockham village. It will also impose create excessive demands on the nearby stations of Horsley and Effingham Junctions where car parking is already under pressure and where car access is not straightforward. Other local resources such as schools and local health services will also inevitably come under pressure from such a sizable development. It is also worth mentioning that constant reference to the site as being a former airfield seems to seek to imply that any development is taking place on previously developed land. As any visitor to the site will appreciate this site remains primarily agricultural.

It is only the concrete runway, which should have been torn up on closure of the site as an operating airfield after a short period of use, which hints at any form of previous development. The developers constantly overplay this idea of the land being previously developed and it unfortunate that the draft plan does not call out the primarily greenfield and agricultural nature of the site.

We would like to take this opportunity to register our support for the Wisley Action Group's stance on this development and would entreat the Borough to reconsider this aspect of the draft plan.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13497  Respondent: 11078337 / Giselle Hampton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The plan refers to various villages being currently washed over by the green belt and goes on to say that "the national planning policy states that only those villages whose open character makes an important contribution to the openness of the Green Belt should be included in the Green Belt" (4.3.12) With no further justification or discussion the Plan then states that 14 villages are summarily inset from the Green Belt (4.3.13). This is wrong, arbitrary and seemingly in conflict with what has been expressed in previous drafts of the Local Plan which stated

"....The Government attaches great importance to the Green Belts and there is a general presumption against new development in the Green Belt."

"...National Planning Policy requires that Green Belt boundaries are only amended in exceptional circumstances and that this must be undertaken through the Local Plan process"

We consider that the Plan has completely failed to make the case that such exceptional circumstances exist and that as such no amendments to the boundaries should be made around the village settlement boundaries or specifically in relation to the proposed massively inappropriate free standing settlement at the former Wisley airfield which also requires land to be taken out of the Green Belt. We consider in particular that the open character of the East and West Horsley and Effingham villages does make an important contribution to the openness of the Green Belt. Specifically we think that the openness of the Green Belt along the A246/A3 corridor is of critical importance, and has the added benefit of buffering the Surrey Hills AONB. We also consider that the current openness of the Green Belt to the west of the Leatherhead/Fetcham/Bookham extended settlement and south of Cobham plays a key role in preserving the character of the Green Belt. As such we think the preservation of the Green Belt status of the historic villages running from West and East Clandon to West and East Horsley and on to Effingham and Ockham is massively desirable and entirely in keeping with national guidelines.

Similarly to create a massive new settlement south of the 43 at Wisley, further compromises the openness of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1588  Respondent: 11078337 / Giselle Hampton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
We are grateful for the opportunity to Comment on the Draft Plan and are supportive of certain aspects in relation to the development in the sustainable locations of Guildford Town Centre and urban areas and on other land such as countryside beyond the green belt and on urban extensions to Guildford, Ash and Tongham.

We believe that the current plan to deliver 1,386 new homes fails to take into account the additional infrastructure and other supporting resources that would be required.

We are completely opposed to any of the suggested changes to the Green Belt and any proposals to inset villages and increase settlement boundaries. Specifically we reject the proposals for the development of the former Wisley airfield site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the proposed development at Normandy and Flexford.

Secondary School

The proposed 7-entry form secondary school as proposed in the plan is not needed. The local secondary schools reveal that the secondary schools nearest to Normandy and Flexford have capacity to include more children as they are undersubscribed. In addition the Guildford County and St Peter Secondary have land available for development, have approved plans for expansion. This would accommodate even more students. The council must recognised that the proposed secondary school is definitely NOT required. Without the requirement for a new secondary school there is no justification to removing the Green Belt status.

Roads and Transport

The local lanes around the proposed development are classified as D roads. These would be unable to cope with the increased traffic of the proposed 1100 new residences representing at least 1100 more vehicles in the area. And the twice daily traffic for the dropping off and collecting children from the proposed secondary school would further compound the traffic congestion.

Even now, it is difficult to both exit Westwood Lane and Glaziers Lane onto the Aldershot Road in the mornings, peak hour, and attempt to cross or turn on to Aldershot Road in the morning and evening rush hour. With school drop off and pick up added to the current traffic this area would be a parking field rather than moving traffic.
Other than traffic the council seems to have no interest in maintaining the quality of the roads. There are ever growing potholes in Glaziers Lane, Westwood Lane, Flexford Road. If it rains for just one night half the road can be flooded forcing drivers to swerve around these new water masses.

Glaziers Lane has a narrow railway bridge not suitable for high volume of traffic and not strong enough to endure heavy delivery lorries needed for the multiple constructions in this plan. There has been no mention in the plans for funding to reinforce or replace or even repair this bridge and the roads leading to it. Westwood Lane has a low single lane railway bridge which would not be suitable to large lorries.

Medical services

The current medical surgeries at Glaziers Lane and the Fairlands Surgery are not able to service the current population. Waiting time for appointments has increased and patients are waiting weeks to be seen. The development plan does not address how further services will be supplied to a large population.

Flooding / Sewerage

Flood risks have not been considered and certainly have not been addressed by the Guildford Borough Council. Rain water flows down the Hog’s Back chalk into Flexford / Normandy area causing a high water table. Drainage of the sewers is inadequate in this area. During the wet season residents in Glaziers Lane have raw sewerage flowing in their gardens. If Thames Water has not addressed the sewerage infrastructure capacity for current residents they will not be able to keep up with the demands from a growing population with the proposed development.

A46 Fails or even breaches the National Planning Policy Framework whilst ignoring rights of local residents.

The council has been neglecting their responsibility to rate payers as there has been no consultation by council with local residents. There has been no council early and meaningful engagement with local neighbourhood organisations. This is a developer driven rather proposal based on ease of throwing up buildings en masse for their greater profit and convenience for the council to work with only one supplier.

The council should be addressing the use of brown space rather than destroying Green belt.

This development is a threat to the Thames Basin Heath Special Protection Area. The green belt is for the benefit of all, not for the one off profits of a small group. The green belt must be preserved – these are ancient woodlands supporting deer, badgers, birds, bees and butterflies. Biodiversity is needed, even in England, to support human life.

Once gone there is no more wilderness.

This development should not be approved as there is no proven need for the proposed secondary school. The council has not provided sufficient justification or special consideration for building on this Green Belt.

I object strongly to the proposed development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
GBC needs to acknowledge that for expediency of getting their plans through they are bending the rules.

Removal of site A46 and A47 from the plan.

I support the removal of these sites from futures plans as the infrastructure does not support the current community:

1. a) The roads are poorly maintained. There is a serious lack of maintenance of roads in the local area. The roads are too narrow for the volume of traffic. The narrow angled bridge at Wanborough is barely safe for the current traffic due to the lack of visibility coming to the crest.
2. b) There is frequent flooding and back up of sewerage into gardens. If there is more than a few hours of rain the drainage on these roads is unable to cope. Further roll off from driveways and covered paths from the development will further exacerbate the flooded roads. The flooding makes it difficult to drive safely.
3. c) Health and Medical provision for the area is insufficient. The Fairlands Clinics are unable to provide appointments with short notice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1422  Respondent: 11078817 / Rachel Miller Johnson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Removal from the Green Belt of homes in Guildford Road, northern end of Glaziers Lane, Flexford, Walden Cottage and Palm house Nurseries traveller site.

The GBC has not provided exceptional circumstances for changes to the Green belt.

I object to the changes to Policy P2 because the council has not addressed many of the 32000 comments made about the 2016 plan.

Policy P2 fails to appreciate the importance and permanence of the Green belt and that it needs to be permanently protected. The intention of the Green belt is to check unrestricted urban sprawl.

I object to the statement in the submission Local Plan under Green belt Policy P2 (4.3.13) which claims that Normandy, Flexford and a further lists of 12 villages are “now inset from the Green belt.” This is untrue as GBC is proposing to “inset” these villages. No decision has been made by an Inspector, therefore these villages remain in the Green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing with regard to the proposed Draft Local Plan Strategies and sites June 2016.

I have many concerns regarding this new plan the most unacceptable aspect of the proposal is the proposed increase in housing for West Horsley. The proposed 35% increase in 6 years is clearly ludicrous. No plans for local infrastructure have been shown. The roads are already overcrowded and the drainage systems are at bursting point. The village designation as a Rural District centre is also inappropriate. The proposed increase in housing will make the local amenities unuseable due to the fact that I already struggle as disabled drivers to park. I also struggle to receive doctors appointments as the surgery is oversubscribed.

The parish council offered a sensible proposal i.e. a limited need for some 20 affordable homes for local people who want to remain in the village, i.e. for young people and for elderly people who wish downsize to a smaller home. This would enable the current community spirit and ethos to remain and allow the village to thrive as a part of proper rural England. This would then respect the NPPF policy which requires that new residential development must respect the character and density of housing in the area and be limited in quantity by the availability of infrastructure and local facilities.

I note also that the designated green belt land which I have always been assured would remain as such, has now become prime building land. I understood in 2014 that it is possible, under exceptional circumstances to change green belt land to enable development. I now understand that this will be obtained by “Insetting”

Can the council demonstrate that all of the required process has been adhered to and recorded and that these circumstances legally allow such re-designation.

Can the council also confirm that all possible brown-field sites have been prioritised for development prior to the green-field being used?

With regard to the proposed development at Manor Farm. I am extremely concerned about the extra road traffic this proposed development of some 135 homes would produce. New residents needing to use the A3 to Guildford or London will chose the shortest route to the main road. This will create traffic down the narrow Long Reach road, which includes a very sharp blind bend towards its North most end. This could easily result in a future accident.

I live in Northcote Crescent and already have problems with our garden flooding during periods of high rainfall. The Manor Farm development lies on land higher than where I am. The large area of impermeable land that will be created by the development will without doubt contribute to this problem.

With regard to the surface water run off from this development at present this runs into a pond at the back of the proposed Waterloo farm proposed development. The area of land around Ockham Road North in this area is already a high risk flood area. These two proposed developments will also add to this problem unless a very major surface water alleviation project is to be undertaken. I look forward to seeing the promised hydraulic modelling which is only the start of design development work. The feasibility of this flood alleviation work, together with a design and budget costs should be investigated prior to consideration for actual residential development. Normal SUDS schemes will not be sufficient to alleviate this problem which needs to be sorted now let alone following extra new development.

In summary our concerns are as follows:

• Inadequate flood prevention planning for Northcote Crescent and Ockham Road North.
• Inadequate road access for long reach to A3 links.
• Inadequate facilities at station parade shops and surgery.
• Inadequate school facilities in area.
• Inadequate consideration for the use of brown field sites.
• Inadequate exceptional circumstances to change green belt land to enable development.
• Inadequate consideration for population growth prediction figures.
• The complete lack of consideration for the National Planning Framework requirements

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4274  Respondent: 11079361 / Alan Dillon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the housing number of 693 homes per annum for the duration of the Plan, as detailed in the current SHMA.

I deplore the fact that GBC allegedly has no information as to the mechanism by which G L Hearn arrived at this figure. If this is so, how can GBC or the general public assess whether or not the figure of 693 is reasonable. I think GBC has been both naïve and irresponsible in placing a contract with GL Hearn which did not allow them full access to the method used for the calculations or, supposedly, the data which were used.

I welcome that Cllr Spooner has said, as stated in the Surrey Advertiser of 15th July 2016, that the SHMA will be revisited by GBC, as part of the consultation, and I hope, in light of this, that they will then adopt a more sensible lower figure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7921  Respondent: 11079361 / Alan Dillon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A22

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Regarding the proposed Keens Lane development, this will be unacceptably close to Whitmoor common, thus raising real concerns about the impact on the resident wildlife.

Keens Lane is unsuitable for coping with increased traffic movements because the road is very narrow – single track at the Gravetts Lane end.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17454  Respondent: 11079361 / Alan Dillon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The University of Surrey should fulfil its obligation to provide much more student accommodation on campus, thus freeing up local housing for normal residential use.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17457  Respondent: 11079361 / Alan Dillon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In general, it is very important that adequate provision is made for all necessary improved infrastructure to be put in place before, or concurrently with, new developments. I refer in particular to roads, water, sewage, main drainage and electricity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17456  Respondent: 11079361 / Alan Dillon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

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I object to the proposed developments at Flexford, Normandy and Keens Lane, Worplesdon.

In both cases these developments will place even greater strain on traffic movements on the A 323, which is already seriously overloaded at peak times. In addition the private application to develop the Roker golf course at Fairlands with a secondary school and 370 houses (16/P/01397) cannot be ignored in the context of the Local Plan. If approved, this development would discharge its traffic directly onto the A323, with wholly undesirable consequences.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17458  Respondent: 11079361 / Alan Dillon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Due account should be taken of increased potential flooding risks, taking account of predicted more extreme weather arising from continued global warming.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17452  Respondent: 11079361 / Alan Dillon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposed use of greenbelt sites in the Plan when the opportunity to use brownfield sites has clearly not been properly explored. Development of the greenbelt should only occur in exceptional circumstances.

The University of Surrey should fulfil its obligation to provide much more student accommodation on campus, thus freeing up local housing for normal residential use.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 11080097 / David &amp; Julia Hunt</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I object to policy A26 Blackwell Farm There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of green belt, and fulfils purposes 1, 3 and 5 very strongly. Purpose 1 - “checking the unrestricted sprawl of large built-up areas”. There is huge pressure to develop on the western edge of Guildford; the University of Surrey has stated publicly that its key objective is to develop the whole of its landholdings, stretching west to Flexford Farm. This, combined with the indefensible boundary being proposed (a hedgerow rather than the existing belt of ancient woodland), will put more of the green belt and the Surrey Hills Area of Outstanding Natural Beauty (AONB) at risk of future development. Purpose 3 “assists in safeguarding the countryside from encroachment” - the proposed movement of the green belt boundary on the west of Guildford to allow for development of the University in 2004 resulted in the encroachment on countryside and the loss of working farmland (including some Grade 2) at Manor Farm. The proposed future change in the boundary would result in further encroachment and the loss of farmland including further Grade 2. The proposed road development with access road from the A31 would also effectively cut off farm access to the south of the development area leading to further urban influence on this countryside. The University’s stated key objective is to develop land, which includes Chalkpit and Wildfield farms leading to the risk of further boundary change and further encroachment in future years. Purpose 5 - “assists in urban regeneration by encouraging the recycling of derelict and other urban land” Whilst all green belt assists towards this purpose, the ownership of this land by the University of Surrey with its extensive landholdings within the urban boundary (including land it leases to the Hospital and Holiday Inn, the Surrey Research Park, Hazel Farm as well as two large campuses) means that the location of Blackwell Farm within the green belt plays an even greater and direct role in encouraging the more efficient usage of urban land. Stopping development on Blackwell Farm would result in the University of Surrey investing in, and regenerating, land in its ownership and delivering its commitments following the 2003 boundary review (including 270 homes for key workers, 3,125 student residences and releasing further accommodation at Hazel Farm). The University has 17 hectares of surface car parking that could be built over with offices and flats. This is a more sustainable option than building over open farmland (largely grade 2 and 3a) within the green belt. The Blackwell Farm development would result in harm to the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the setting to the AONB. (Blackwell Farm forms the views into and out of the Hogs Back ridge). The NPPF is clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. All development proposals within and adjacent to the AONB must conserve or enhance its special qualities. The NPPF also makes it clear that applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public’s interest. Guildford Borough Council has not shown that the proposed housing development or the extension of the Research Park, or the proposed link road from the A31 to Gill
Avenue, is in the wider public interest. Indeed, the increased traffic through the already congested Egerton Road/Gill Avenue junction, which would result from the development, would impede emergency vehicles travelling to the Hospital and this would be very much against public interest. GBC’s Policy P1 states that, “The Surrey Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development. All proposals will be considered against whether they conserve and/or enhance the setting and views of the AONB”. I question how the proposal to carve a new two-lane carriageway through the AONB fits this policy, or meets para 115 of the NPPF? Finally, nearly the whole site has been identified as a “candidate area” for AONB status in the Landscape Evaluation Study commissioned by Compton, Worplesdon and Wanborough parish councils. Therefore, the entire site should be treated as though it is within the AONB during this local planning process. The access to the proposed Blackwell Farm site will put additional peak hour pressure on two of Guildford’s worst congestion “hot spots”: the A31 (Hog’s Back) and the Tesco Roundabout on Gill Avenue. GBC’s proposal to create a new major route into Guildford from the west at, or close to, the Down Place private driveway, and to make this the main access to the planned Blackwell Farm development, does not appear to have been thought through. There are queues stretching back from the Farnham Road Bridge as far as the Down Place driveway entrance most weekday mornings and any traffic generated by the new development would not be able to clear the junction. In order to accommodate the volume of traffic using the new junction (generated by residents of the new housing estate, employees at the Surrey Research Park, Hospital and University, and visitors to the new school/supermarket), there would almost certainly need to be a roundabout (rather than the proposed traffic-light controlled junction) and GBC has ruled out a roundabout on grounds of landscape impact and traffic. The secondary access to the site at Gill Avenue also presents problems, and as GBC states in its Transport Assessment (14.9.5), changes planned for the Tesco roundabout will not mitigate against the increased level of traffic through the junction as a result of the Blackwell Farm development, and this in turn will impact on the Egerton Road/Gill Avenue junction, which serves the Royal Surrey County Hospital. I question whether it is responsible to allow a development that would impede emergency access to an A&E department and a major incident unit. The traffic impact resulting from the development of Blackwell Farm on the strategic road network would not appear to be properly assessed but it would be alleviated in part (but not completely) by widening the A3. However, timing and funding for this work is unclear so there would be many years of traffic chaos before any widening took place (if indeed it does). More significantly, the widening of the A3 would create noise and environmental impact on the neighbouring residential areas of Onslow Village and Beechcroft Drive and a six-lane highway would cause greater severance between Guildford and Blackwell Farm and areas to the west. The NPPF states in Section 6 para 47 that local authorities should “identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15”. In a footnote to this, it further adds, “To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.” I consider that the proposed access arrangements to Blackwell Farm are wholly inadequate for a development of this scale and thus the site cannot be “viably developed”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A55</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the removal of land from Greenbelt for the provision of two traveler pitches on Puttenham Heath Road to 'enable delivery'. The area warrants Green belt status and should remain in Green Belt. Removal is a big step towards the eventual development of permanent accommodation, which would result in loss of the two pitches.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14334  Respondent: 11080097 / David & Julia Hunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy D1 Making better places  I object to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force. The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14336  Respondent: 11080097 / David & Julia Hunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy D2 Sustainable design, construction and energy  Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1, not buried away as a minor detail in Policy D2. This policy amounts to “greenwashing”, expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital, especially the countryside, from attempts to rig the housing market. This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is difficult to understand, since no such networks are available locally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/14340  Respondent: 11080097 / David & Julia Hunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy D3 Historic Environment

This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to “support development” that might “enhance” heritage assets leaves wide scope for abuse in the form of destructive commercialisation and financial leveraging of relevant sites. This policy is based on the false premise that Guildford’s heritage is inherently in decay. This is a developer’s charter – a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council’s reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the “reasoned justification”, the actual policy wording in the blue box leaves too many loopholes. Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14343  Respondent: 11080097 / David & Julia Hunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy D4 Development in urban areas and inset villages This policy that does not address the opportunity for building in the urban areaThe plan envisages that 40% of homes built will be “affordable”, but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called “affordable” homes or pay an “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand). The number of homes planned in the urban area is much too low. There is a glaring need for regeneration in many urban areas, particularly Guildford Town Centre but this is ignored
in favour of building homes on green-field sites instead. This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure. The plan envisages a large expansion of the retail sector, but this is hard to justify because the sector is in rapid and continuous decline.

THE BROWNFIELD OPPORTUNITY

Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. But first we must make good use of our urban brownfield before we consider building in the Green Belt or countryside. Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy that states clearly. “We are committed to a brownfield first initiative whereby all applications on previously developed land are given fast track priority and every facility to promote development for residential purposes and employment purposes in order to satisfy the needs of local people. In parallel a low CIL incentive should be given for all residential development on brownfield land.

In response to the detailed objections received in the Regulation 18 process of the 2014 Local Plan and also in accordance with government policy a Guildford brownfield land register should be urgently compiled showing address, ownership, occupier, current use and detailed planning brief.

Perhaps someone could be appointed at GBC with a clear briefing to deliver brownfield targets of housing and employment space.

GBC needs to accelerate the residential redevelopment at Woodbridge Meadows, Walnut Tree Close and the Station within the next 5 years.

GBC needs to examine the residential development opportunity of the 25.7 acres of car parks in GBC ownership.

I do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC.

The reality is that the Town Centre has the capacity for significantly more homes. See details on GGG website - Guildford Greenbelt Group

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/14322  **Respondent:** 11080097 / David & Julia Hunt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I object to policy E1 sustainable employment. I note that there is a significant reduction of between 71% and 79% in the previous job target and resultant 79% reduction in employment space in response to the many objections lodged in 2014 against an unsubstantiated agenda for economic expansion in the last draft and based on new findings by Aecom in the latest ELNA 2015.

I have concern as to the ill-informed clustering of all B classes in terms of the clarity of market evidence required to inform effective planning and a failure to provide a clear understanding of business needs required under Section 160 of the NPPF. I also note the dramatic reduction in assessed demand by two Employment Land Needs Assessment Reports carried out under the same terms of reference within a period of 2 years which calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC.

I am concerned however that the research undertaken by Aecom is generally superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space. No proper analysis has been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research.
undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area. GBC appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of useful property market research or forward planning. What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8. The lack of appreciation as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below). Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan. Little regard is given to the opportunity of B1 b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub. I note that the past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 derived from VoA analysis and that the calculated annual floor space demand is 0.7% over the plan period up to 2033. I support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires. We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So I should target high added value small and medium sized enterprises rather than the headquarters of larger corporations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy E2 location for new employment floor space. I object to the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt. The Surrey Research Park currently extends to 65,000 sq m. There is already granted consent to expand to a further 9,000 sq m (14%). The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis. The ELNA 2015 calculated annual floor space demand is 0.7%. The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period. The necessary growth in floor space over the plan period is therefore 17 years x 0.7% = 11.9%. There is currently 14% expansion space already available. The proposal by GBC to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required. The Research Park is currently developed at a density of 25% plot ratio. The majority of existing buildings are 2 stories giving a developed floor space plot ratio of 12.5%. The existing Research Park has the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing densities of existing academic buildings on the university campus which are three to four times higher. Together with the existing expansion of 14% through existing consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university. A preferred location for increased B1a and B1b space would be in the Town Centre close to housing and a convenient transport hub.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/14326  Respondent: 11080097 / David & Julia Hunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy E3 maintaining employment capacity I object to the ill-informed policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land. It is also contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential). I believe that the existing government policy which has recently been made permanent of allowing change of use from B1a to C3 is sound. Many office buildings reaching an age of more than 30/50 years become redundant in terms of energy compliance making them illegal to occupy for employment purposes and the cost of refurbishment makes them redundant and uneconomic. The reality of market demand is that the gross development value of refurbished residential space is in excess of the gross development value of refurbished old office space in many locations. (this gross development value assessment is supported by the analysis by property consultants GVA in the supporting evidence within the Allies and Morrison Masterplan for Guildford dated 2015) To resist change from B1a to C3 is contrary to the concept of brownfield first for residential development schemes. To resist change from B1a to C3 in Strategic or Significant Employment Sites is contrary to the concept of integrated mixed use communities whereby the journey to work is minimised. London has led the way with significant residential schemes being created from redundant office stock. A good example is the South Bank in London adjacent to Waterloo Station where in 2005 the Shell Centre has been converted into flats. Another early example is the 2000 scheme at Metro Central Heights at Elephant and Castle where the old Alexander Fleming House was converted to 435 flats by St George. GBC needs to adopt more modern trends and policies.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14328  Respondent: 11080097 / David & Julia Hunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to policy E4 Surrey research Park. I support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. I object however to the completely unnecessary expansion of the Research Park into a larger Business Park. I believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University. I believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. I object to the inclusion of B1c uses which is inappropriate and unnecessary. Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise. There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user Research parks that lose their way stop being the location of choice for new innovative enterprises. I hope the Surrey Research Park in Guildford remains focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing. Monitoring indicators should include new start-ups and new patents created. Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments. Support the idea of a variety of sizes of unit including some small units (between 15 – 80 sq m) bearing in mind one workstation is 10 sq m. Consideration should be given to the concept of shared “enterprise hubs” where individuals can take pay as you go workstations in shared spaces similar to touch down business centres similar to the “enterprise village” concept. Object to the policy of any new extension of the research park more than the existing 14% already provided for within the park or within the footprint of the park. The Surrey Research Park currently extends to 65,000 sq m. There is already granted consent to expand to a further 9,000 sq m (14%) This space has been available for 10 years and is still to find a taker. The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis. The ELNA 2015 calculated annual floor space demand is 0.7%. The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period. The necessary growth in floor space over the plan period is therefore 17 years x 0.7 = 12% which is less than the current expansion space of 14%. The research park is developed at a plot ratio of 25%. This could be increased to 50% within the same footprint of the existing park without damage to its amenity. The actual current land use for development in the park is in fact only 12.5% because most buildings are 2-storey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The consultation process was not well publicized; many Parish Councils had no idea of this. The emphasis on voluntary efforts and greater community efforts is far removed from reality for this 'solution' was presented for almost every aspect of rural life from managing crime to looking after elderly to education and more besides. Villages by nature are usually small and the percentage of the population who are able to do voluntary work is smaller still. The solution is therefore unworkable. The results of the consultation were not publicized but were instead collated and summarized and bore no resemblance to the submissions I had sight of.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLP16/14332</th>
<th>Respondent: 11080097 / David &amp; Julia Hunt</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I object to policy E6 the leisure and visitor experience. I believe that the importance of a visitor attraction hub could be much better articulated. Guildford has great potential to become a “must see” destination for tourists and visitors. Surrounded by the natural beauty of the Surrey Hills, it is already distinguished as an historic county town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back.

The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town. Given the local and wider catchment of the town Guildford should strive for high quality definition making it a great centre for people to live in and visit. Guildford the historic “Gateway to the Surrey Hills” has far more potential than Guildford just any other stereotypical centre found anywhere around London. Re-branding walks, such as a new “Pilgrims Trail” similar to the Patriots trail in Boston USA with marked yellow footsteps leading from the station to the River and up through the historic heart of the town. There is a need to make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms. There is a need to help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to RHS Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently bypass Guildford to go to Bath, Oxford or Cambridge instead. THE TOWN CENTRE OPPORTUNITY I do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. What the town centre needs in terms of urban regeneration and to attain a thriving night time economy is more residential development. The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015. The reality is that the Town Centre and other areas of brownfield in the borough has the capacity to provide significantly more than this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to policy H1 Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions. The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated. I support higher density development but not high-rise development (ie over 10 floors) in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes' walk of Guildford railway station. Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required above it, with parking beneath. Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to policy H2 Affordable homes. “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people. In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit. I question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally in enormous debt (contradicting the Government’s policy of encouraging labour mobility and development in poorer regions, where homes are cheaper); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes will be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and by the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed in the plan might influence the market in a more remote part of the UK, but not here. This
policy's version of “affordability” is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14311  Respondent: 11080097 / David & Julia Hunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy H3 Rural Exception Homes  This is a type of Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix”, this can include “market” housing – i.e. normal commercial development which in Guildford usually means expensive executive homes. This policy means building anywhere, and ignoring all historic planning restrictions. The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14345  Respondent: 11080097 / David & Julia Hunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy I1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy I1 Infrastructure and delivery Most of the borough’s infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. Yet this plan’s commitment to building housing estates across the Guildford countryside will mean either major infrastructure investment that no-one is prepared to pay for or else a catastrophic and simultaneous collapse in transport, educational, medical, energy, water and communications services. The plan targets greenfield sites – requiring heavy infrastructure investment – in order to generate CIL income necessary to meet an infrastructure shortfall that is already serious. The current draft CIL scale also encourages development on greenfield sites rather than brownfield and will reduce or negate developer's obligation to sell a percentage of homes at 20% below market value. The policy wording says nothing about roads and traffic. The Council’s methodology for assessing infrastructure needs in this area is inadequate, identifying only the tip of an iceberg of existing congestion. Compton Village is already close to tipping point, yet it will see a significant increase in traffic volume, will be completely
congested and yet no plans exist to mitigate the problem. The schemes referred to in this policy barely solve existing congestion and are inadequate when development takes place. The full impact on local road networks has not been fully considered. Some proposed development locations would require highway schemes that involve demolishing property and road-widening in residential areas to solve the resultant congestion. The A3 improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place. These detailed investigations are being deferred until the planning application stage and will be left to developers to prepare. If a site then proves to be unsustainable its Green Belt protection will have been lost for no reason and unsuitable development will take place by a more insidious process. Compton Village will actually incur increased traffic flow as a consequence of A3 widening according to the study, yet as was pointed out above, no solutions are in place to improve the situation. Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy 11. By prioritising greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognising this as a key issue, the plan makes too many assumptions, not least being the verbal promise that development will not take place without infrastructure preceeding it. It is not clear how this will happen and is not in the Plan, as it should be, if it is achievable. The highways network is under stress at peak times in many parts of the borough. Queuing is the daily experience of drivers going to and from work. The local plan recognises the problems in para 2.14. Much of the road network is single-carriageway, and junctions act as constraints. The key evidence on future traffic conditions is provided in the Strategic Highway Assessment Report (SHAR) which summarises the results of the tests carried out by Surrey County Council at the request of GBC. Five scenarios were examined using SCC’s strategic traffic model. Scenario 1 contains all developments and planning permissions from 2009 to date. As such it corresponds to today’s circumstances, and describes the current unsatisfactory traffic conditions in peak periods. Scenario 5 represents the position at the end of the plan period, including all development and highways schemes in the local plan. The results of the analysis show that there will be widespread congestion in the morning peak hour across the network. The key strategic routes, the A3 through Guildford NE bound, and the M25 between Junctions 10 and 11, are shown to be at or over capacity. The summary network statistics presented in the SHAR, while useful, require some interpretation because the analysis of vehicle-hours is derived from link speeds only, and does not reflect junction delays and queues. The tables that show the ratio of flow to capacity and level of service are especially helpful to gaining an understanding of the conditions on the network in the forecast. Where the forecast traffic volume is above or close to capacity, flow becomes unstable and there is congestion. The SHA results provide evidence that, in 2031, congestion will be worse than it is today on much of the network. It is the case that the traffic modelling does not take into account the potential for increased use of other modes, but the trip rates used for developments already have built in the typical level of use of other modes, and services will be required to meet that need. It is also the case that the model does not allow for park and ride, which would improve matters in the town centre, as discussed below. In order to gain an insight into conditions across the network, it is necessary to combine information from several tables in the SHAR. Table 4.5 shows that the M25 and A3 will be at capacity in Scenario 5. The other roads that will have poor levels of service include those in Table 4.5 but also those in 4.12 (except the A3) and those in Tables 4.3 and 4.4 with levels of service E and F that will not be given some relief by improvement of the A3 in Scenario 5. Paras 4.10.3, 4.4 and 5 point out that there will be increased congestion. Given that the starting point is unsatisfactory, there can be no expectation that the schemes in the Infrastructure Development Plan will provide an overall improvement. There will be some local benefits, such as the Ash rail bridge for example, but in general conditions will be as bad and in many places, such as Compton Village, worse. So the statement in the SHAR para 4.2.5 that ‘the combined mitigation as reflected in Scenario 5...indicates that at the strategic level it accommodates the additional PSLP demand’ needs qualifying – ‘at the cost of a lot of queuing’ and makes no mention of the impact this will have on pollution, which is already a known problem at the A3 end of Compton. The cumulative effect of the additional traffic generated by the developments in the local plan will be to increase congestion, even with the proposed highway schemes in place. More detailed analysis of the junctions and queuing is required. So we question the conclusion that the developments would have “an acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF”. Appendix 3 of the Transport Topic Paper shows the phasing of housing development and transport infrastructure. The major scheme being considered for the A3 between the A31 and the A320 is scheduled for delivery in the period 2023/24 to 2027/28. The strategic developments at Blackwell Farm and Gosden Hill Farm are shown as being phased in from 2021/22 onwards. The Garlick’s Arch development is shown as starting in 2019/20. Therefore, there will be a period in which the existing A3 has to cope with the additional demand arising from those developments before extra capacity is provided. The following comments regarding the strategic sites are taken from the SHAR: Blackwell Farm – there will be congestion at the A31 junction, and the problems at the Tesco junction, and the Egerton road / Gill Avenue junction (para 4.9.5). Traffic is likely to access the Surrey research park and
the RSCH through the development (para 4.7.3)Gosden Hill Farm – there will be an increase in traffic through Burpham. There will be pressure on the A3100/B2234 roundabout (paras 4.7.6, 4.7.7 and 4.7.8). Wisley – traffic will increase on minor roads to gain access to the A3 (N and S bound) and other routes (para 4.7.11). The development will add more traffic to the A3. The Burnt Common slips help alleviate the traffic through Ripley according to the model, but queuing on the A3 could mean this does not happen (para 4.7.14) Normandy/Flexford – the report has little to say about the impact of this large development. The increase in flow on Westwood Road is noted (para 4.5.7). Tables 4.10 and 4.11 show junction delay reducing at the Westwood Lane, B3000 junction, but an increasing at the Puttenham Hill/Millbrook junction. Ash – development in Ash is not specifically addressed, but there are major increases in traffic on a number of roads. The new rail bridge will bring relief (traffic will move to the next junction). Slyfield – there are no remark relating to SARP, and as there are no additional trips shown in and out of the Slyfield residential zone in Tables 3.3 and 3.4, it is possible that this development has been omitted. There is a significant increase in trips to and from the Slyfield industrial zone, which will impact on the A320 and Clay Lane. Town Centre – the report has very little to say about the town centre. It is evident that the model is forecasting severe congestion on the approaches to the town centre, such as the A281, the A31 Farnham Road, and Woodbridge Road for example. No mitigation measures are planned. And in the Transport Strategy, GBC states that the intention is to adopt Allies & Morrison’s Scenario 2 which would have the effect of significantly reducing the capacity of the town centre road system. The implications have not been examined, but traffic using the A281 from Waverley, for example, would be affected.

The B3000 will be severely affected by development schemes and will not benefit from road improvements. It is essential that the impact of all change to road networks are looked at in conjunction with one another for any survey to be meaningful. **The local plan does not state an objective for congestion. The two strategic objectives that are included for infrastructure refer to supporting sustainable development and delivering a balanced system. However, in para 2.15 there is an aspiration expressed about opportunities ‘to improve the performance of the road networks through transport infrastructure and service improvements’, which taken with the previous paragraph includes reducing congestion. The evidence so far shows that this will not happen. The mitigation proposed is not sufficient to overcome the problems that will be caused by the level of growth in the local plan. Congestion will worsen. The network will lack resilience and be vulnerable to disruption due to incidents. Minor roads will have to cope with a lot more traffic, for which they are unsuitable.**

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14347  Respondent: 11080097 / David & Julia Hunt  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Answer (if comment is on questions 1-7 of the questionnaire): ()  

I object to policy i2 Supporting the Department of Transport’s “Road Investment Strategy” This policy is too vague and unrealistically optimistic. Decisions by Highways England on improving the strategic road network (the M25 and A3) are still years off. The Council have suggested a very expensive tunnel under Guildford, but there is no evidence to show that this is a realistic option. Even if Highways England accepted this (which is highly unlikely in the post-Brexit public spending climate) it would not be built until the end of the plan period at the earliest. Other, less expensive A3 improvements, and changes to the Junction 10/Heathrow stretch of the M25, will also take years to agree and complete. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is foolhardy. Surrey is the most congested county in England, with 683 people per square kilometre, compared with an English average of 413. This policy will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new
homes at Wisley Airfield alone). This is a major development constraint that should have been applied to the OAN to constrain the housing target.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14349  Respondent: 11080097 / David & Julia Hunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy I3 Sustainable transport for new developments This is another aspirational policy, not grounded in the practical realities of daily life. It consists of a standard, box-ticking list of local government measures unrelated to the specifics of the plan. Like infrastructure, transport appears to be an afterthought; the policy fails in its essential job of guiding planning decisions, since it assumes development of any kind can be supported by sustainable transport. The sustainability of the dormitory settlements which the Council want built across the countryside depends on a general “modal shift” from private car use to walking, cycling and public transport. This is unrealistic. The proposed sites are often miles away from the nearest railway station. Bus services even in the largest villages are almost non-existent – just one bus to and from Guildford each day in the Horsleys and none at weekends. Since bus services depend on profitability, they cannot be expanded and the Council are not proposing to subsidise new ones. Rural buses are too slow anyway for busy people. Most rural roads in the borough are narrow, winding, hilly, potholed, muddy and unlit. Many flood badly and have no footpaths. The desired modal shift would require a comprehensive co-ordination of bus and train timetables with services every few minutes, seven days a week, to stops within walking distance of every home in the borough. This kind of integrated public transport system has been achieved in Switzerland, for instance, but only at huge public cost and thanks to a political consensus supporting state ownership of trains, buses and the post office, which delivers rural passengers as well as mail. There is absolutely no chance of this in the UK. The vast majority of the borough’s residents are not, in practice, able to cycle. This includes children, the elderly, commuters who have to look smart, the infirm, the unfit and people carrying goods or shopping of any kind. Dependence on walking and cycling discriminates against these groups, which include some of the most vulnerable members of the community. It is socially unjust. One in two working people in Guildford commute for up to 3 hours a day. They will not leave their cars for even part of their journey if it means longer travel times. Park-and-rides are a welcome part of the transport mix but are too slow for commuters and others on a tight schedule. For an adult couple going shopping it is still cheaper to park in town. I like the idea of water buses but have concerns over the reality. The Wey is narrow and, with a river speed limit of 4mph, boats are too slow for anything but recreation. Except on the tideway, not even the Thames has such services. The addition of two new stations appears attractive but will slow down train journeys, which are already slower than at any time since the 1930s. Knock-on effects on localities where the new stations are built have not been worked out or presented. Ie. Cost of housing will increase.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14351  Respondent: 11080097 / David & Julia Hunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy I4 green and blue infrastructure. This policy is a box-ticking exercise with no teeth to it. It sits oddly with the plan’s onslaught on the Green Belt. The plan to build on large areas of countryside and to inset villages will cancel out any benefits from extending the principle of enhancing biodiversity beyond Biodiversity Opportunity Areas. There is no mention of the value of wildlife gardening to biodiversity or the important role that larger gardens play in a village setting. ABSENCE OF POLICY ON RIVER WEY I object to the omission of a policy for the River Wey which was included in the previous local plan. The existing policy G11 from 2003 Local Plan should be included so that development within the River Wey corridor will only be permitted provided that: It protects or improves the special character of the River Wey and the Guildford and Godalming Navigations, in particular their visual, setting, amenities, ecological value, architectural and historic interest;The special character of the landscape and townscape in the corridor is protected or improved;Views both within and from the corridor which contribute to this special character are protected or improved;Where appropriate, public access is provided to and along the River and the Navigations. The Nature Conservation value of the site is protected or improved GREEN BELT SITES I object to ALL Green Belt sites allocated for development in the local plan object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses.” This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. This amounts to a war of attrition by the Council in conjunction with developers, since many busy residents are tired of repeating the same comments as it appears to be a waste of time and effort. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14313  Respondent: 11080097 / David & Julia Hunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy P1 Surrey Hills Area of Outstanding National Beauty This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated. Much of my concern stems from the loose wording of the Policy, which in some places renders the policy ineffective, for example:“All proposals will be considered against whether they…”“All development proposals within and adjacent to the AONB will be expected to conserve or enhance its special qualities”Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage. Of particular concern is the paragraph 3, which begins:“Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits…”This whole opening clause is unnecessary and almost invites
development proposals. I believe that it should be deleted, and the sentence should therefore begin: “There is a presumption against major development in the AONB in accordance with NPPF.” In addition to the weakness of the language, I am also concerned that the AONB criteria listed in the policy are not the most important ones in determining whether a planning application should be approved. Aside from the one outlined in the first bullet point (which relates to the AONB setting) none of these criteria is concerned with the key characteristics of AONB, ie landscape character, scenic beauty, important views, tranquility etc. Whether or not a development supports the rural economy or provides public access are of far less national importance than preserving the quality of the landscape itself. I believe that the AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and would like to see the following sentences reinserted: “The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered” “Proposals within the AGLV which would have a negative impact upon views into and out of the AONB and which do not respect the setting, will not be acceptable” In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/or AGLV may be necessary and deemed appropriate. Finally, I would like to see a clause which gives protection to the candidate areas for AONB status in the forthcoming Surrey Hills AONB Boundary Review. This should include Blackwell Farm which was recently reviewed by an Independent consultant and deemed worthy of inclusion as a candidate. I consider that all land that has been assessed as meeting the latest Natural England criteria for AONBs should be subject to the same level of protection as an AONB, not just land that has been designated AGLV.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14315  Respondent: 11080097 / David & Julia Hunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy P2 green belt. This policy states, “the general extent of the Green Belt has been retained.” This is a misleading statement. The policy wording is weak in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. Once gone it is gone forever. It is not the Council’s to give away. Policy P2 completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world. Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

1. Agricultural production
2. Rural leisure and tourism amenities
3. Water catchment
4. Flood control
5. Biodiversity
6. Natural heritage
7. A carbon sink for air pollution
8. Room for public facilities such as parks and burial grounds
9. Profitable film locations (e.g. Shere)
10. Future economic potential such as mineral extraction (even fracking)
11. Natural beauty, landmarks, open space, rural views and sight lines
12. Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations. It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. I object to the “insetting” of 14 villages from the Green Belt. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat. I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors. To “inset” two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead.

I object to the removal of over 400 hectares of Green Belt land in and around Blackwell Farm to facilitate further development of Surrey Research Park and for 1800 homes. Over 60 hectares were removed from Green Belt 12 years ago for the same developer (Surrey University) who has yet to fulfill their planning obligations. This valuable land has been squandered with over 17 acres of surface car parking and as one of the key features of Green belt is its 'permanence' this second request for yet more Green Belt land to be released in such a short space of time, with all the outstanding issues that remain makes this all the more objectionable.

Furthermore I object on grounds of the impact this development will have in terms of congestion on our highways, these issues have been highlighted under 'infrastructure'.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy P3 Countryside (i.e. beyond the Green Belt) This is more protective – as a policy – than the proposals for the AONB and the Green Belt, so is anomalous. I am not in favour of building on this area, since urban, brownfield areas are sufficient to meet all reasonable housing targets. There is no need to build on any green fields if brownfield, previously developed land is used efficiently (without garden-grabbing). This policy refers to the countryside near Ash and Tongham (see paragraph 4.3.28). This area does not justify stronger policy protection than any other part of the borough. The fact that the current and previous Council Leaders represent it should not give it preferential status: “we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”. Green Belt and AONB areas should by definition have higher levels of protection than non-Green Belt areas. It should also be noted that Ash and Tongham lie beyond Guildford far away from London and therefore make no contribution to controlling Metropolitan urban sprawl, that is presumably why Ash and Tongham are not in the Green Belt already. This policy, however, attaches higher priority to preventing the “coalescence between the Ash and Tongham urban area and Aldershot” than it does to the primary purpose of the Metropolitan Green Belt, which is to stop London sprawl. I agree to the prevention of coalescence but this should apply to all villages including East and West Horsley and Flexford and Normandy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14320  Respondent: 11080097 / David & Julia Hunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy P4 Flood risk and water source protection zones Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as Woodbridge Meadows Industrial Estate and the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside. I strongly believe that this policy should not be used as a convenient excuse not to build on the extensive area of brownfield sites between the station and Ladymead. Any new development in this area could easily be built on stilts with flood resistant ground floor parking in areas that are identified as high flood risk. This area has been built over successfully over the last 50 years. We do not need to stop now.

I do not support building directly on (as opposed to over) flood plain as the land is effectively a soak away, but intelligent architecture has been dealing with this problem for many decades in other parts of the UK and the globe.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to Policy S1 as stated and the presumption in favour of sustainable development. The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Policy S1 ought to set a clear framework. No definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts. The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is without value. Under this policy, any development will qualify as “sustainable”, thereby failing to apply the NPPF’s most important guideline. The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies. The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all. This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to policy S2 the Borough Wide Strategy and the commitment to build 13,860 homes based on the Strategic Housing Market Assessment (SHMA) 2015 prepared by GL Hearn. The OAN “objectively assessed need” figure in the SHMA of 693 homes a year is far too high.

I am very surprised and concerned that GBC have adopted the OAN of 13,860 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole. Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50% from the 594 new homes identified in their own SHMA. “It should be noted that local evidence (Strategic Housing Market Assessment - SHMA) highlights a need for an additional 499 new affordable homes every year in the Borough and a total of 594 new homes every year when taking into account demand. Given the level of environmental constraints present in the Borough, it is considered that the provision of an average of 292 dwellings per annum represents a reasonable level of housing growth for Woking and is deliverable.” Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt.”

This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement. However it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt. A detailed and comprehensive professional review of the SHMA dated June 2016 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 693 homes per annum to 510 homes per annum. The 41 page report by NMSS which can be found on the GRA website entitled “A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford”. It was a real community effort. It was paid for by over 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan. The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald. He is an independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit. NMSS found that the SHMA used in the Local Plan incorrectly adds extra homes to its basic demographic projection to allow for improving affordability of housing, increased student numbers and economic growth.

The report found that none of these additions were justified based on the evidence presented within the SHMA. The report concluded amongst other matters that:

The affordability of housing in Guildford is no worse than in other Surrey districts and boosting supply beyond the demographic OAN would not result in a noticeable improvement in affordability but simply in more people moving to the area.

There are reasons for believing that the SHMA’s estimate of the number of homes needed for students may be too high and that an adequate provision for students is already included in the demographic OAN. The report advises that the Council should commission a separate student housing need figure for Guildford given the distorting effect of students on our overall OAN. It envisages that, once this exercise is undertaken, improved accuracy means the overall OAN would be likely to reduce still further.

The SHMA seeks to estimate the number of homes needed to support employment growth using employment rate assumptions that are inconsistent with the employment forecasts. This produces misleading results. An analysis of the
Cambridge Econometrics and Oxford Economics forecasts using employment or economic activity rate assumptions consistent with the forecasts suggests that in neither case is there a need to provide more housing than suggested by the demographic analysis. Indeed, in both cases a smaller population growth (and hence fewer homes) could support the jobs growth that is forecast. A further independent report was procured in 2016 by the Campaign for the Protection of Rural England CPRE from Richard Bate of Green Balance, an independent consultancy with expertise in demographic and housing matters to carry out a review of the GL Hearn SHMA

The report by Green Balance runs to 37 pages and its findings are that the OAN for homes in Guildford should be reduced from 693 per annum to 481 because:

1. the vacancy rate figures should be taken from local government annual records rather than from the 2011 Census. This would reduce vacancy rates to 2.9% in Guildford.
2. there should be no increase for affordability above basic demographic change.
3. there should be no increase for Student housing and it was considered unrealistic that the University should be allowed to exert such substantial pressure on the domestic housing market.
4. the use of employment-led forecasts should be abandoned using purely household projections instead which are more reliable as a form of prediction. Two completely independent expert reports are surprisingly consistent in their findings. In broad terms a figure of approximately 500 homes per annum would appear to be a correct estimate of OAN for Guildford. However, this is before constraints are applied to arrive at an acceptable housing target. The SHMA is based on pre-Brexit projections for economic and population growth, including migration. These now need to be revised downwards. It is unacceptable that demographic and economic model assumptions have been withheld by GBC and cannot be checked making the process unaccountable.

The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA. Both the National Planning Policy Framework and National Planning Policy Guidance provide a clear policy direction that the overall housing target should be reduced by a variety of constraints to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors. I have corrected this omission below. Infrastructure policies should be planned at the same time as Local Plans but in this case they have effectively been left out and are not sufficiently developed. The Framework also makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.

THE NEED TO APPLY CONSTRAINTS

Ministerial guidance in relation to building on the Green Belt is clear:

1. “the single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt” - Nick Boles to Sir Paul Beresford MP 7th February 2014.
2. “we were always very clear that we would maintain key protections for the countryside, and, in particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt” – Nick Boles to Sir Michael Pitt, Planning Inspectorate 3rd March 2014.
3. “Planning Guidance, updated in March 2014, also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt” – Nick Boles to Sir Paul Beresford MP 18th June 2014 70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply.
Exceptional circumstances need to be shown to adjust boundaries. Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements). Constraints should be applied to the Objectively Assessed Housing Need (OAN).

However, this itself is overstated and should be reduced from 693 per annum to 500. In view of the comments above it would appear logical to apply CONTRAINTS in line with government policy to a corrected OAN, of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council. This would result in a more acceptable and practically achievable HOUSING TARGET of 250 homes per annum which over a 20-year period would be 5,000 homes. All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 20,000 objections made by residents to the 2014 draft plan and also relieve the additional problems of inadequate infrastructure. It would also mean that there is currently 8.5 years supply of housing (2131/250) which is made up of existing permissions granted (1,518) and completions made (613) during 2013/2015. (Monitoring Report by GBC 2015) The Brexit vote may have strengthened government policy further. Theresa May, the new prime minister, announced on 11 July that she is personally committed to protecting the Green Belt once she takes office. Whilst I have many significant objections to the GBC Local Plan I applaud the policy statement by GBC in their Monitoring Report, “We will continue to monitor the use of previously developed land, and continue to identify as many opportunities as possible for redevelopment of previously developed land.” I believe it will be to the benefit of all residents if GBC can apply themselves vigorously to this endeavour in order to protect the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1653  Respondent: 11080097 / David & Julia Hunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Key parts of the evidence are still missing, flawed or based on withheld assumptions. The Strategic Housing Market Assessment overstates need, the Green Belt and Countryside Study uses a flawed approach, and the Transport Assessment is too late and incomplete to be relied upon to inform the Plan.

The Plan excludes the Town Centre Master Plan, which plays a pivotal role and fails to address the results of infrastructure difficulties, or use these and Greenbelt to constrain the level of development.

The Employment Land Needs Assessment

I object

This document omits many important points that are to be addressed at a future stage. The information is, however, very relevant and necessary and without it the document is weak on evidence. The overview given does not assess the capacity of existing supply to accommodate future growth. The paper acknowledges that almost 9% of commercial premises are empty and this somewhat flies in the face of arguments to vastly increase the volume until the reasons are understood. Around 30% of businesses are considering leaving Guildford (congestion being cited as a reason). There are also issues with planning permissions being granted to convert office space to residential, whilst at the same time it is argued that more
offices are needed? The contradictions appear to indicate that policies related to this need firming up and that the evidence is incomplete.

I disagree with 40% of land in the town centre being given over to retail as there is no evidence that Guildford will 'buck the national trend' in terms of declining high-street sales, as has been suggested by Cllr Furniss. Guildford urban area ranks no 1 in terms of being the most sustainable location in the borough and, as housing is a priority, there should be more than 1,172 residences in the town centre.

I object to Policy E4 (expansion of the Surrey Research Park into the Blackwell Farm) The existing Research Park has been built at a very low density (25% plot ratio), which is very low for an urban extension. The majority of existing buildings are 2 storeys giving a developed floor space plot ratio of only 12.5%.

The existing Research Park has acres of surface car parking, which provides it with the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing density of the neighbouring academic buildings on the university campus at Manor Park, which is five times higher.

Together with the existing expansion of 14% through existing consents and the opportunity to increase its density, the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university, without utilising additional land.

Infrastructure

I object

The infrastructure schedule makes reference to 'improvements' without saying what they are. It includes a junction at the Guildford end of the A31, and another junction at Tongham. No evidence or traffic modelling data is available to demonstrate whether these 'improvements' will indeed improve anything at all given the additional traffic that will be generated by the new developments included in the plan. The Highways Assessment indicates that, even with these 'improvements', the level of congestion on the A3, A31, the B3000 and A25 will leave these roads over capacity and congested.

Constraints should be applied to the housing need/number as a full application of the overinflated number will have a severe detrimental impact on our road network. Smaller housing estates may be more difficult financially, but they would have less impact on infrastructure and could be considered where infrastructure already exists. The borough has many acres of surface car parking which, if replaced by multi-storey versions, and combined with current Brownfield sites, would free up enough land to build housing where it is wanted and needed and not on valuable Green Belt. There would be no need to build high-rise style development in Guildford town, which we don't support, but we do believe that buildings of 6-10 storeys (with underground parking) would be in keeping in some urban areas (where they don’t impinge on important vistas). [Some existing buildings already reach 5-7 levels in height].

The traffic maps omit the area south of Guildford borough completely and the lack of detail about impact on the B3000, a strategic route, is highly questionable, particularly as there are no solutions in place to deal with the impact. I am particularly concerned that, after the main highways routes of M25, A25, and the A320, the B3000 will incur the greatest increase in flow as this road is already close to capacity, with tailbacks at peak times. The road is no longer fit for purpose and modelling shows that developments planned, and the introduction of a new westerly route through Blackwell Farm, will severely worsen the situation, whether major work takes place on the A3, or not.

The Highway Assessment

I OBJECT

The strategic highway assessment requires a great deal more work and hence I OBJECT to the inclusion of this as evidence.

The B3000 runs through Compton, a small village with many listed buildings, most of which are very close to the road. The road already carries in excess of 5 million vehicles a year with average flow rates exceeding most A roads. It is the only
settlement area in the borough where pollution levels exceed EU regulations and it is close to capacity now, with tailbacks at peak times, which add to the pollution problem. [see legal section]

The study is highly misleading. It refers to a figure of zero additional traffic from scenario 3, which includes the traffic from the strategic sites, one of which is partly in Compton. The assessment does not make it clear that the modelling is extremely limited and only includes impact on developments within the immediate area. Blackwell Farm is excluded from Area 107 (part of Compton) as false boundaries have been set. I believe that the impact from the strategic sites will be far-reaching and will most certainly impact Compton and beyond. Each village needs to be able to see the impact that development will have.

The Highways Assessment concentrates on peak time traffic only and gives no indication of overall volume increases or traffic type using specific routes outside peak hours. Understanding of the overall increase is important, as there is a bridge on the B3000 between Artington and Compton, which has a width restriction and may also require a weight restriction as it needs replacing within the next 2 years and no funding has been set aside for this. Instead Network Rail, SCC, GBC and Waverley BC continue to battle over responsibility for, and scope of, the project.

It appears that traffic data has been collected at different times of the year and over varying time scales in order to provide averages. This method of data collection can underestimate measurements by at least 30%.

Furthermore, I have been told that the person responsible for ratifying traffic data at Surrey County Council (SCC) has been off sick for over a year and that, whilst the daily data boxes continue to collect data, that data has not been collected or analysed for 2015. The data put forward for Compton's B3000 was based on a 3-week period in January and, as this was not representative, we understand it was removed. That said, the year-on-year data is for different periods and different times, varying from a few weeks in winter to longer periods over many months. I would like a more robust approach to traffic data collection.

The cumulative effect of the additional traffic generated by the developments in the proposed submission Local Plan will be to increase congestion, even with the proposed highway improvement schemes in place. More detailed analysis of the junctions and queuing is required. We question the conclusion that the developments would have *An acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF*. We do not believe that the impact on the B3000 will be acceptable, as it is already operating beyond capacity, and this situation will be made much worse following the mitigation proposed for the A3.

The Highways Assessment is limited to 30 results. Roads have been omitted from the report and it is unclear whether findings for the B3000 (also referred to as The Street B3000) are in fact from the Street or the roundabout from which there is a feeder road to Godalming via Priorsfield Road.

The table comparing scenarios and the impact on traffic is difficult to decipher. Scenario 1 includes current planning permissions plus Waverley's strategic sites. This shows an increase of just 9 vehicles per hour at peak times on the B3000. The next scenario 2 is the same, but includes GBC's strategic sites. Given that there is a strategic site in Compton of 1,800 homes and another of 1,000 at Normandy, the expectation would be for the volume to be not only higher, but considerably higher. The result is however, ZERO. We understand that this is because the impact measured is only from the immediate area and, as Blackwell Farm has been removed from the village for modelling terms, this does not give a realistic result. The omission of the Town Centre Master Plan and its impact on the roads further diminishes the integrity of this Highways Assessment.

Even without the full impact being understood, it is clear from the scale of development on the west of Guildford (1,800 homes at Blackwell Farm, 1,000 homes at Normandy, 1,300 homes at Ash, 3,800 homes in the Aldershot urban area, 1,200 homes at Borden) that the increase in traffic on the B3000 and other main routes would be severe.

The Highways Assessment shows that as a result of the proposals put forward in this draft of the Local Plan the B3000 will suffer the highest increase in flow rates at peak times (after the M25, A320 and A25. It also reveals that traffic flows would increase if the A3 was widened, as the A3 would then attract more traffic via the B3000. Despite this, there are no solutions planned to mitigate the situation and we are therefore strongly objecting to the level of development and in particular strategic development at Blackwell Farm as outlined in the Local Plan.
The proposal to introduce a new route to Guildford town centre from the west via Blackwell Farm has been ill thought out. The volume of traffic that will use this new ‘rat run’ through the new development and the university campus/business park, has been underestimated. There will be problems for traffic wishing to exit the new development in both directions during peak hours - traffic is frequently queueing for miles along the A31, and the Tesco roundabout is one of the worst bottlenecks in Guildford. The knock-on effect on the Egerton Road/Gill Avenue junction would impede emergency vehicles getting to and from the hospital.

The 4-way junction on the A31 has no detail at all and the concern is that permission in principle will be given to the site in the hope that these problems are surmountable. If they are insurmountable, which I believe they are, then enormous amounts of Green Belt land within the setting of the Surrey Hills AONB will have been sacrificed for nothing. The 4-way junction, if it goes ahead, is likely to be huge and, due to its elevated position, will cause significant harm to the AONB in terms of landscape and light pollution.

The Highways Assessment has many limitations, not least being the absence of the Town Centre Master Plan, which includes potential road closure and re-routing. Compton is likely to be very much affected by any reduction in road capacity in the town centre and it is important that we are presented with the whole picture.

The Assessment acknowledges that not all impacts of proposed Blackwell Farm development have been modelled and that, due to the emphasis on the A31 and the A3, not all roads were included.

The report concludes that the improvements to the A3 are necessary to maintain adequate flow rates on the strategic network. Further work is needed to determine what impact any widening or junction improvements will have on local roads, and what will be done to mitigate against the increased flows through Compton, particularly given that a section of the B3000 though the Village is anticipated to become an Air Quality Management Area. GBC has resisted requests by members of the PC to have the northern end of The Street made an AQMA, but readings of nitrous oxide in this area are well above EU legal limits.

There is little information about the tunnel but the map indicates that one access/egress point will be in Compton near the A3, although no land has been safeguarded for this purpose. This is likely to have the same impact as the improvements to the A3, i.e. increased traffic (and pollution) through Compton.

**The Spatial Hierarchy**

The spatial hierarchy, which outlines Guildford's preferred strategy, does not match up with the proposed plan. The hierarchy places Brownfield sites (including those on Green Belt) as a priority, but the Plan has 66% of development on Greenbelt and only 34% on Brownfield. The hierarchy lists Guildford town and urban areas as a priority followed by inset villages and identified Green Belt villages. A relatively small percentage of housing is allocated for Guildford town (the most sustainable location) and Green Belt areas, such as Blackwell Farm, with high sensitivity have been classified as within the 'Guildford urban area' when they are in fact in the open countryside. We are told that only 1.6% of the 89% Green Belt has been earmarked for removal and that the 6% removed via insetting doesn't count as these villages are already developed. If this is the case, why list them in 4.1.16 of policy s2 - Spatial Strategy?

4.18 The preferred options cannot accommodate all that Guildford 'needs'. This is untrue. Two specialist consultants have independently critiqued the OAN and both question the level of uplift and the use of ONS data without full correction for changes and anomalies. They refer to 'double accounting' as the uplift is introduced at several stages and the assumptions that result in the final OAN are not explained. See comments on Strategic Housing Market Assessment (SHMA).

**Strategic Housing Market Assessment (SHMA)**

**I Object**

The “objectively assessed need” figure of 693 homes a year is too high.

A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the SHMA method should be changed to consider student housing need separately due to the distorting effects of students on the figures.
The current SHMA inflates the proposed housing figure due to:

- failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability, and
- flaws in the method for estimating the number of homes needed to support job growth.

It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

Two additional reviews of the SHMA reach similar conclusions, one having been produced by CPRE and the other by Cllr. David Reeve.

**The Land Assessment**

**I object**

The exclusion of sites of 5 dwellings or fewer from the list might make administration easier, but the addition of these sites plus windfalls and outstanding (but current) permissions gives rise to a higher number of dwellings than is actually needed. There is therefore no justification for release of all the Green Belt put forward.

The criteria used to include or exclude sites because of this study lack consistency, with many sites excluded as 'unsuitable' with no further explanation offered (many of which were in the urban area of Ash). The assessment lacks objectivity and detail.

**Green Belt & Countryside Study**

**I object**

GBC's Green Belt & Countryside Study does not value appropriately the “fundamental aim” of Metropolitan Green Belt or look strategically at options for developing in major settlement areas beyond the Green Belt. It is pointless for London to apply constraints to protect its Green Belt if areas within it, such as Guildford, choose to ignore this option. It is the same Green Belt and serves the same purposes, all of which are acutely valuable.

The way Green Belt is parcelled up and scored is invalid: serving 2 Green Belt functions well is as legitimate as serving 3 to 5 functions less effectively. The Green Belt sensitivity analysis is not a valid basis for informing decisions. This method also omits purpose one, on the basis that all Green Belt sites encourage regeneration of urban sites. This should not be excluded for it is valid and could even be argued to be particularly valid in areas close to the town. Boundaries used for Blackwell Farm were neither permanent nor defensible.

Proposed removal from the Green Belt of a number of relatively small sites where development of an exceptional nature has taken place, plus adjoining land, has lost sight of the scale at which Green Belt is effective.

Assessment of which villages to take out of the Green Belt does not adequately consider that villages contribute to the openness of the Green Belt, as seen from surrounding AONB.

A key principle of Green Belt is its permanence. The University Consultants stated this 13 years ago when seeking permission to take Manor Farm out of the Green Belt to create Manor Park. They reassured residents that the boundary would not be frequently moved and that Blackwell Farm would be opened up to the public for “informal recreation”. The same Consultant has now repeated this promise in putting forward the University plans to develop on Blackwell Farm, saying that the new boundary would be permanent for at least 25 years!

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** SQLP16/1655  **Respondent:** 11080097 / David & Julia Hunt  **Agent:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan preparation process has had inadequate regard for national policy, which attaches “great importance” to the “openness” and “permanence” of Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level.

The Sustainability Appraisal seems to have lost sight of the concept of Sustainable Development as described in the National Planning Policy Framework to the extent that we question whether it complies with the requirement.

The report states that there are no pollution issues in Guildford. This is not true. The A3 end of the B3000 exceeds Eu regulations and this should be flagged in

I object

The 2015/2016 air quality management report has not yet been published and this will/should include an area at the A3 end of Compton, which exceeds the recommended max NO2 reading. One year results for NOx are 48.728 with high's of 68 using National bias adjustment.

Cllr Furniss indicated that the location of the test tubes may have made them invalid, but measurements show that they were positioned correctly and monitored for over a year by GBC environment officers, who have now added additional monitoring devices (See Annex 2 – Correspondence between Cllr Curtis and Cllr Furniss). This area qualifies as an air quality management area (AQMA) and it is disingenuous to omit this from the report or to use an old report on the basis that the 2015 report is not yet published, as the problem is known and recognised by the environment department within GBC.

The traffic survey shows increases in overall flow at the B3000 monitoring point, of values between 5.6% and 16.5%. This would severely impact flow, which is not in line with National Policy as further congestion would exacerbate the current air quality issues as the A3 end of the Street.

I do not believe that a regulation 19 consultation is appropriate. Whilst few changes have been made, additional sites have been included without opportunity for regulation 18-consultation input.

The video used and paid for by GBC and taxpayers is biased towards development, and hence raises questions over the validity and legality of such marketing campaigns. All the individuals featured in the video, with the exception of one nurse have previously spoken in the Council Chamber in favour of house building/building on Blackwell Farm; and there is not a single voice representing protection of the Countryside or outstanding landscapes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object

The plan is not so much positively prepared as avariciously prepared. I do not consider that it is reasonable to take on unmet need from neighbouring authorities, which have given greater protection to their Green Belt if it means our own is compromised on the scale being put forward.

I believe that constraints should be applied to the housing target, which we understand equates to the objectively assessed need (OAN) as no reasonable constraints have been applied. The constraints that could and should be applied are Greenbelt and considerable infrastructure issues. The solutions suggested to accommodate the inordinate levels of growth are both inadequate and costly and the net result will be serious debt for many years if not generations.

It was recommended by landscape consultant Alison Farmer Associates that the area known as Blackwell Farm should be considered in the AONB boundary review, yet it was omitted in Surrey CC’s landscape evaluation. This meant the Parish Councils of Worplesdon, Compton and Wanborough had to fund an independent review to ascertain whether the area was a contender for AONB classification. The survey was carried out by in May 2016 by Land Management Services Ltd, which concluded that most of the 265 hectare farm was of a landscape and scenic quality that merited inclusion within Natural England’s revised Surrey Hills AONB boundary.

It raises serious question about the soundness of the evidence base when Surrey CC says that it only has to account for evidence submitted and not for that omitted? The area within the proposed development site at Blackwell Farm should now be considered by Surrey Hills as part of the AONB boundary review and land to the west should remain undeveloped, as it is important to the setting of the AONB.

The plan is not justified. Residents groups have suggested other strategies but these have not been tested or considered against the current trajectory, which has remained largely unchanged since day one.

Many aspects of the Plan were strongly objected to in 2014 and not only have these points been ignored, they have in fact been embellished or made worse. I refer to the points that GBC referred to in their own summary, which stated that most people objected to the scale of development and the harm to the Green Belt. At that time there were 4 strategic sites and now there are 5. At that time approx 50% of development was in Green Belt and now it is 66% with only 34% on previously developed sites. 58% of development is on just 5 sites.

A more realistic appraisal of the town centre with more multi-storey car park development and less retail would make way for a greater percentage of housing in the town centre, which is after all the most sustainable and sought after area. Additionally, greater pressure must be placed on the University to house more students at Manor Park in order to free up affordable rented accommodation in the town for key workers.

There is a conflict of interest when the developer (University) drags its feet over the provision of promised student accommodation (thereby putting pressure on the housing market) whilst at the same time seeking permission to build 1,800 new homes to help Guildford’s need? The University is at least five years behind with programme of building student residences and staff housing. It is widely agreed among residents groups that the University must fulfil all of its current building plans and substantially increase the proportion of students on campus. If the University built the outstanding units, the housing need would reduce substantially yet much of this is omitted from the outstanding permissions list?

GBC has approached development without applying constraints that are applicable such as Green Belt and infrastructure. It is wholly inappropriate to build a Plan without constraints when there is widespread opposition to this approach. Furthermore, there are serious doubts over the validity of the objectively assessed housing need. Housing need underpins the entire plan, and we are being asked to accept the figure of 693 on trust. Without an understanding of the methodology
behind the OAN, the public cannot 'buy into' this figure, especially as it has been illustrated by two reputable professionals that there have been errors such as 'double accounting', which has resulted in uplift. Both consultants have concluded that a more accurate figure would be around 500 new homes pa and the most recent one, which was done in pre Brexit -June 2016 acknowledges that due to the high number of International students here in Guildford a student SHMA would better inform this plan. Both consultants feel that the current SHMA is flawed and that the OAN of 693 is too high. These reviews will be submitted by CPRE and the GRA and we support the findings of both.

Putting 58% of development on 5 sites, which are within the Green Belt, or largely within the Green Belt, is not consistent with national policy. The definition of 'exceptional' is forming an exception or rare instance; unusual; extraordinary. What possible exceptional circumstances can justify 3 sites of approx 2,000 each and two of 1000 each, on Greenbelt. This makes a mockery of the term ‘exceptional’?

The plan has a maximum number and a hefty buffer. It has underestimated windfalls and overestimated need. It is likely therefore that if one of the major sites fails to come through, the Plan could still succeed in terms of numbers, but would fail in terms of impact on infrastructure and reliance on aspirational, but distant 'yet to be discussed' schemes such as railway stations, making the plan undeliverable. If more people are not given the opportunity to live in Guildford town, the night time economy cannot grow and if the gamble to use 40% of the land for retail fails, shops will close and we will have created a leafy green ghost town, whilst the villages outside the town will have changed beyond all recognition as the impact of urban sprawl takes its toll.

The plan puts many eggs into 5 baskets with 58% of all development on just 5 sites. If these are not deliverable, the plan will fail. This strategy has been roundly criticised by Inspectors in other parts of the country.

Taking on such a high OAN without scrutinising it and then taking land out of Green Belt to fulfil it, and using developer funding to secure infrastructure (which reduces significantly the proportion of affordable housing delivered) is destructive and risky.

It is inconceivable that 5 sites between 1,100 and 2,000+ each can be built on Green Belt land without affecting the purposes of the Green Belt.

AONB should be given the highest protection. Despite being put forward for AONB review Blackwell Farm was omitted and an independent consultant had to be commissioned by local parish councils. The findings showed that the area met Natural England’s latest criteria for AONB and should not therefore be developed but should instead be properly recognised.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account the impact on future AONB or for views in and out of the existing and future AONB from public areas as determined by planning policy. It is feared that if this site were approved and if access could be made possible without causing serious problems to the surrounding road network, that the AONB in this location would undoubtedly be destroyed.

GBC argues that it is necessary to remove more than 1.6% of its 89% Green Belt and to remove more than 6% of its Green Belt from villages (by way of insetting) in order to meet its need, yet at the same time the Council advocates making an additional area Green Belt? The area of land being put forward for inclusion within the Green belt is on the same ridge as two areas of Green Belt it wishes to remove (Normandy & Blackwell Farm). This approach lacks consistency.

Cllrs Paul Spooner and Matt Furniss have stated clearly that there will be no development without supporting infrastructure and that the infrastructure must come before, or alongside, development. It is difficult to see how this will materialise as developers’ CIL contributions (which will fund infrastructure) are paid from profits made from the development. This statement appears to be unenforceable and could offer false reassurance to residents who may support the Plan on this basis.

Developers are being asked to fund large amounts of infrastructure. They will offset this against any agreement for affordable housing and it is highly possible that affordable housing will not be built or that only a small proportion will be built. This was one of the key drivers and is factored into the housing need, yet may not be delivered. Where is the general analysis to see what level of affordable housing might actually be delivered given the level of infrastructure needed to implement this level of development on new sites?
The omission of the Town Centre Master Plan (on the basis that this has different timescales) invalidates two key components of the Plan - the Infrastructure and Highways assessments. The suggested road closures in the town centre and the resulting re-routing of traffic should be factored into the highways assessment, but they are currently omitted. The consequences of this could render the whole Plan undeliverable and I don't believe the Plan can be approved without factoring in the Town Centre Master Plan.

GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA), which CPRE and GRA consider unsound. The methodology for the uplift and assumptions made have not been made available and thus the openness and transparency required for public understanding as outlined in the NPPF has not been adhered to.

I understand that Highways England will not start to consider its intentions as regards the A3 in the vicinity of Guildford until 2018. It is difficult to see how plans can be approved without the inclusion of this information.

Network Rail has not made available for the public consultation any plans for a new railway station at Merrow, nor have we been told where the station car park would be situated nor how the railway bridge between Merrow and Burpham would be re-constructed to take the additional traffic. Likewise, there are no detailed plans for the railway station at Park Barn and Network Rail has not confirmed the status of either. These schemes must have a sounder footing to be included in the Plan if they are to be used to justify large developments nearby.

The access to, and from, Blackwell Farm (via the A31) has not been thought through. There proposed new route will likely be used as a rat run to the A3/Guildford, but this will put pressure on a congestion hot spot, and result in increased traffic at the Compton turn-off and Down Lane (home to Watts Gallery). It is also recognised that congestion at the Tesco roundabout will be made worse and this area is already subject to considerable problems. Additional traffic via the business park from Blackwell Farm will add to congestion at the Egerton roundabout and impede access for emergency services to the hospital.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account of the AONB, but this does not account for views in and out of the AONB from public areas.

The greenbelt sensitivity study is not objective. The reference to Blackwell Farm as 'South West Guildford Urban' is totally misleading as it is unadulterated countryside that fulfills all the purposes of Green Belt. I consider this Study, which was the subject of much criticism in the last plan, to be flawed, yet it remains in this Plan. Why?

The damage caused to the Green Belt by the addition of Blackwell Farm would outweigh benefits gained from development, as there is ample space and lapsed planning permission on the existing Manor Park land for development for student accommodation, which would free up affordable rented accommodation in the town.

The proposal for Garlic Arch was added to the draft Local Plan without any consultation under Regulation 18. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Guildford citizens.

No land has been safeguarded for a tunnel, which would show a real intent.

This consultation included 'significant changes' according to GBC, although most residents would strongly dispute this. Some key reports were added and 6 weeks was not long enough to properly digest the information and impart this to residents. Many additional questions had to be asked and many points required clarification, which essentially meant adequate information, was not made available until two thirds of the way through the consultation.

The level of objection at the 2014 consultation was considerable - these objections have NOT been dealt with, but have been carried through to a regulation 19 consultation, undeterred. This is not in the spirit of Localism or the NPPF.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Cooperation is a two-way street. Guildford objected to Waverley's plans for Dunsfold on the grounds of increased traffic and in the same submission referred to positive consideration of unfulfilled OAN. Guildford also refers to its duty to consider Woking's unfulfilled housing. Guildford does not have land to spare to assist Waverley or Woking without taking vast amounts of land out of Green/belt, which is protected by the NPPF. Greed is not 'an exceptional circumstance' and if both Woking and Waverley (and indeed London as it is the Metropolitan Green Belt) prefer to protect their Green Belt then the question must be asked as to why Guildford is happy to relinquish its Green Belt land, especially in the face of strong public opposition.

Many also question the choice of just Woking and Waverley as partners in the SHMA as there are considerable links with Aldershot and Farnborough in Rushmoor, which have very different needs and their inclusion could have provided a better balance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the inclusion of Blackwell Farm in the plan and would like to attend the examination.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment - Localism

The Plan is supposed to be informed by residents and by parish councils and residents' groups and their input used to formulate the Local Plan, not for it simply to be presented to them and objections and subsequent input ignored. Despite a great deal of effort from these groups and many like-minded responses, the Plan has not taken their concerns on board. The Plan has barely changed since day one and residents feel their views have been ignored and that the consultations have not been genuine. To add insult to injury, some of the key points raised have actually been exacerbated or made worse, such as the scale of development and harm to the Green Belt and issues over infrastructure.

The NPPF is open to interpretation, but it is our belief that GBC has chosen to interpret it in a way that lacks objectivity in an effort to appease developers in order to avoid costly court cases at a later stage. GBC has cited cases where development has been granted in an effort to justify this pro-development stance but has failed to balance this against the many sites where development has been refused.

To gain true public reaction, material presented has to be factual and unbiased and written without jargon and acronyms. This has not been the case. A degree of 'double speak' has led to absurdities such as 'affordable housing' which is over £300,000 i.e. ten times the average salary; 'safeguarding' which does not mean protection of land as most people would think, but rather potential future development and 'insetting' which means removal? It is recognised that these terms are not locally derived but all the same they are confusing for most of us.

Some Councillors have shown a lack of knowledge about environmental matters. Cllr. Gunning - webcast 24th May section 7 - 3:39

'About ancient woodlands, of course they are very attractive things, but they are ancient and trees don't last forever, so can we be practical about ancient woodlands and consider their value or their life, I should say, their life'

May 11th - Cllr Ellwood announced that he couldn't understand what all the fuss was about pollution as his Mother had lived (presumably unaffected by it) under the flight path at Heathrow?

Whilst people have been encouraged to take part in consultation, objectors have been subjected to name calling and public humiliation. There are too many examples to list and so I am listing the most recent. http://www.guildford-dragon.com/2016/07/10/letter-not-surprised-mr-patons-comparison/#comment-157440

The Local Plan has divided communities and highlighted weaknesses and alliances, which have resulted in a breakdown of trust between residents and those whose job it is to implement the Plan.

The Plan has been roundly criticized and objected to and yet it is presented to us once again. Many feel the consultations to date have been worthless and feel they have already made their points, which were ignored and will not therefore be making them again as they fail to see the point?

It simply is not possible to address infrastructure shortfalls by building in the hope that developers contributions will cover the costs as the level of development needed negates any benefits gained and in many cases, the situation is made worse.

Central government funding is needed to address current problems so that funding from development can be used to implement additional infrastructure needed to make new sites viable without damaging their surroundings. It must be accepted that geography and lack of previous investment leaves some areas with less opportunity to do this than others.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/794</th>
<th>Respondent:</th>
<th>11080097 / David &amp; Julia Hunt</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
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We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/5114  Respondent: 11080257 / D J Ellis  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

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- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/433  Respondent: 11084865 / Nick Hinchliff  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
1. There has been **no implementation of the necessary infrastructure** to support the proposed increase in housing, particularly as regards West and East Horsley, in terms of roads, school places, drainage, telecommunications, power supply and local amenities. A proposal to put forward this Local Plan to enable developers to move in without having secured these infrastructure increases would be reckless and incompetent planning.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/432  Respondent: 11084865 / Nick Hinchliff  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This email contains my response to the Proposed Submission Local Plan: Strategies and Sites June 2016

I strongly object to the above proposed Local Plan on the following grounds:

1. The assumptions behind the projected population growth on which the plan is based are fundamentally flawed, as further explained later. Moreover the result of the recent referendum to leave the EU will have a major impact in terms of decreasing the influx of people into the Borough, and therefore renders **out-of-date** the projections made before the referendum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1237  Respondent: 11084865 / Nick Hinchliff  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. It is clear that the increases in population proposed by in the June 2016 Plan will have a major detrimental impact on the lives of the people currently living in the affected areas, and on the surrounding countryside. This loss of protected green belt areas is neither wanted nor needed by the Borough residents and will mean an important loss of the associated amenities for Borough residents.

2. The proposed June 2016 Plan will change irrevocably the character of the affected villages in the Green Belt. There is absolutely no evidence that the residents of these villages want to see such change taking place.

3. It is clear, and has been clear for considerable time, that the residents of the Borough are overwhelmingly opposed to such plans as the June 2016 proposal and its predecessors. It is high time for the Guilford Borough Council to act in accordance with the views of the majority of Borough residents, rather than to continue with proposals that benefit a minority with a vested interest in the proposed major new housing developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1244  Respondent: 11084865 / Nick Hinchliff  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

To elaborate further, the proposed increase in the population of the areas affected by the June 2016 Plan substantially exceeds any increase arising from “organic” growth of the existing resident population of the Borough.

It is also clear that the primary beneficiaries for removing areas from the green belt protection are not the existing Borough residents but are

1. property developers together with a small number of people with vested interests in such developments taking place,
   and
2. people not living in the borough who might become potential new residents as a result of housing developments in current green belt areas.

There is absolutely no sound case as to why priority should be given to the interests of groups i and ii over the interests of the existing Borough residents. In fact, clearly the contrary is the case.

It is clear that there is overwhelming support for retaining the protection for our green belt areas in the Borough. The open and accountable local government required these days, demands that the Borough Council follow the views of the majority of the Borough population on the issues of:

1. What sort of size of increase in the resident population numbers we want to have in the Borough as a whole.
2. What sort of percentage increase in housing numbers is acceptable to existing communities within the Borough.
3. What types of housing developments the existing communities want to see in their areas.
4. Which alternatives, Green Belt or other sites, we want to see used for the proposed new housing developments.
5. The committed and Council-funded increases to infrastructure that need to be in place ready to support new housing developments before these swamp existing facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<tr>
<th>Comment ID: PSLPA16/878</th>
<th>Respondent: 11086433 / Colin Carmichael</th>
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3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPA16/3889</th>
<th>Respondent: 11086433 / Colin Carmichael</th>
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1. Major doubt concerning housing numbers: the estimates of housing requirements used are not soundly based with a disproportionate impact on the Horsleys

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Respondent: 11086433 / Colin Carmichael</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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</table>
Objections to Guildford Borough Council Proposed Local Plan (June 2016)

I have lived in West and East Horsley since 1984 and object to the level of development proposed for the Horsleys in the draft Local Plan for the following key reasons:

1. Proposal to remove the Horsleys from the Green belt: the ‘exceptional circumstances required before taking action have not been demonstrated.
2. Extension of the boundaries of the settlement areas of the Horsleys: no sound reasons have been given for the proposed changes.
3. Infrastructure is already overloaded: local schools are full, medical facilities are stretched, drainage is inadequate, roads and car parks are overloaded and there is little or no scope for improvements.
4. Station Parade is designated as a ‘district centre’: this designation results from a misreading of the nature of the facilities in the village and would inappropriately target the area for future urban developments.
5. Development of over 2,000 houses at Ockham (Wisley Airfield) under two miles away: the impact of such a huge development on the Horsleys will be huge.
6. Major doubt concerning housing numbers: the estimates of housing requirements used are not soundly based with disproportionate impact on the Horsleys.

I trust that these objections will be fully considered in the consultation on the Guildford Borough Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

10) I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/7271</th>
<th>Respondent: 11086433 / Colin Carmichael</th>
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Development of over 2,000 houses at Ockham (Wisley Airfield) under two miles away: the impact of such a huge development on the Horsleys will be huge.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16287  Respondent: 11086433 / Colin Carmichael  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Station Parade is designated as a ‘district centre’: this designation results from a misreading of the nature of the facilities in the village and would inappropriately target the area for future urban developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2916  Respondent: 11086433 / Colin Carmichael  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2918  Respondent: 11086433 / Colin Carmichael  Agent:  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I have lived in West and East Horsley since 1984 and object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/2914</th>
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Answer (if comment is on questions 1-7 of the questionnaire): ()
4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1445  Respondent: 11086529 / Sue Carmichael  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I have lived in West and East Horsley since 1984 and object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5. I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars

b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements

d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)

e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest

f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

1. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

2. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

3. I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

4. I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

5. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

6. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I have the following objections to the proposed development at Three Farms Meadows, Wisley, and to the Guildford Borough Council Local Plan. Please confirm that all of these comments together with all my previous comments have been passed to the Inspector.

1. I object to the inclusion of Three Farms Meadows in the draft Local Plan for a number of reasons including:
   - It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
   - It is further from railway stations than any other identified strategic site.
   - It is close to one the most congested junction in the country (M25 Junction 10).
   - Local roads are at capacity particularly when the SRN is not free-flowing.
   - Any public transport (bus) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs.
   - It is adjacent to the most popular visitor attraction in the south-east, RHS Wisley, where visitor numbers are increasing every year.
   - There is insufficient employment available locally so that almost all residents will have to travel to work.

1. I object that the increased area, being on the south of the site facing the Surrey Hills AONB, will increase the negative impact of the views from the AONB.

2. I object to the removal of additional 3.1 ha from the green belt without any justification.

3. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.

4. I object to the fact that the Council has failed to remove this site from the local plan despite thousands of objections from local residents and statutory consultees.

5. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A Regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

6. I object to the extension of the plan period by one year as it has not been identified as a major change.

7. I object to the inclusion of a 10% buffer in the housing number over the plan period as unnecessary.

8. I object to the housing number and I believe that the housing number is poorly based and open to legal challenge.

9. I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development.

I object to the Council wasting the time and money of tax payers and local residents by not following due process and ignoring previous representations. I consider, for the reasons listed above, that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/6719  **Respondent:** 11087009 / David Penny  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in the local area, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

6) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

7) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

8) I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC’s Planning Committee.
After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6711  Respondent: 11090145 / Tim Good  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A39

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Plan proposals for Horsley, specifically proposed housing development, West of Ockham Road North, ‘Site Allocation A39’

I would like to register three specific objections, summarised below, to the proposal for development of the land adjacent to Ockham Road North (‘Site Allocation A39’) in the GBC Proposal’ arising from the proposal to remove this area from the Greenbelt around Horsley.

The land above, comprising open pasture, is flanked on one side by the Stratford Brook and its floodplain and on the other by the ancient Lollesworth Woods. As such it comprises an integral part of the greenbelt both for Horsley and the wider area. The land is flat, poorly drained, flood prone and unsuitable for application of ‘Sustainable Urban Drainage Schemes’ (SUDS) that would mitigate these risks. Access to the site is also problematic given the drainage problems on Ockham Road North (see below, Objection 1). These concerns and some of the evidence to support them are summarised in the three objections below:

Objection 1. Frequent Flooding on Current Access Road to Ockham Road site

Horsley residents using Ockham Road North, one of the main road and pedestrian routes through the village, are familiar with the hazards arising from overflowing storm drains and standing water that accumulates in this area whenever heavy rainfall is experienced (for example on July 15th, 2016, photography available). There are several areas on Ockham Road North that suffer from inadequate storm drainage, however the most severe appears to be just north of the railway bridge and coincident with the proposed entrance to the A39 site. This common experience of Horsley residents is corroborated by the current Environment Agency (EA) flood maps which also show a high risk of flooding from surface water along this section of Ockham Road North. In addition to these issues on Ockham Road North the only access to the site appears to be via a new road (see GBC A39 map) across land designated as Zone 3 flood risk by the Environment agency (see EA flood map for planning), raising questions about the resilience of this route for access by the emergency services.

Objection 2. Flood Prone Character of Site A39
The land comprising Site A39 is virtually flat. British Geological Survey (BGS) maps and boreholes show that the fields are underlain by a thin (<1m) veneer of sand and gravel above the thick impermeable London Clay Formation (see also Objection 3 for implications of the latter). These sands and gravels comprise the deposits of streams that flowed through the area from the high chalk downland south of Horsley towards the Thames Basin to the north in the recent geological past when climate was somewhat wetter than present. Today, the Stratford Brook which flows north to south across the area is a modern remnant of this older drainage system and is classified as a ‘Main River’ by the Environment Agency.

Environment Agency maps show that ~30-40% of the land outlined in GBC Site A39 (excluding area used for access road to Ockham Road North) comprises the floodplain of the Stratford Brook and fall within the Environment Agency highest Zone 3 Flood Risk classification.

Just as with the poor drainage along Ockham Road North the experience of local residents adjacent to the fields comprising Site A39 confirms the location of flood prone areas suggested by Environment Agency maps. Observations of standing water and additional streams not shown on current maps, both in winter and summer however, suggest the EA maps may actually underestimate frequency of flood events and hence current and longer term risks. Hence the Evidence Base for current evaluation of the local drainage may be inadequate.

Objection 3. Unsuitability of Land for ‘Sustainable Urban Drainage Schemes’ (SUDS)

The land comprising Site A39 is unsuitable for ‘Sustainable Urban Drainage Schemes’ (SUDS) that would commonly be used to mitigate the additional runoff/flood risk associated with development of the site, according to a recent British Geological Survey Report (BGS Report GR_205554/1, September 2014) focussed on this area. The occurrence of the impermeable London Clay Formation at shallow depths (<1m) across the entire site suggests a very high likelihood of persistent or seasonally shallow groundwater. As a consequence, engineered solutions, such as infiltration ponds, to cope with additional runoff caused by development would probably not be satisfactory (see map).

In summary, there are three objection about the suitability of the land adjacent to Ockham Road North (Site A 39) for development and hence no justification for removal of this land from the Greenbelt. Specifically:

1. The approach roads are poorly drained and the single access point crosses an EA Zone 3 floodplain.
2. All of the land comprising Site A39 formed a floodplain in the recent geological past. Approximately 30-40% of land (excluding approach road) now comprises the floodplain of Stratford Brook and has the highest EA Zone 3 flood risk classification.
3. The area is poorly drained and unsuitable for sustainable drainage systems (SuDS) schemes that might mitigate risks associated with development according to the British Geological Survey (BGS)

Significantly, the experience of local residents tends to confirm the accuracy of the current Environment Agency Maps regarding the location of flood prone areas associated with Site A39.

Hence I urge the Council to maintain the current settlement boundaries and Green Belt land around Horsley and reject proposals for development of the land comprising Site A39.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. Other objections
2. I object to the exaggerated "housing need" figure of 13,860 which is far too high and results in the completely unnecessary development of the Green The way students, economic need and affordability are calculated artificially and erroneously inflates the housing need and key methods used to calculate the housing need have been withheld using excuses of dubious legality. The majority of students at the university do not settle in Guildford, are not long term residents and should therefore be outside the scope of housing figures on the plan. No account has been taken of the "Brexit" factor, which is likely to further reduce demand from housing from non-UK nationals as migration is likely to be more tightly controlled.

1. Demographics would appear to indicate that the Guildford area, and Surrey as a whole, has an ageing population and a lower ultimately this will lead to the housing need being lower as more people will die, with fewer replacing them, so the existing housing stock could be sufficient.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3597  Respondent: 11095905 / Joanna Holden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Specific Objections to the Draft Plan relating to Send
2. I object to the building on the Green Belt at Send at Garlick's Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually
3. Garlick's Arch contains ancient woodland and is subject to flooding To build and tarmac over land here would either increase the flooding issue here or move the flooding on to nearby properties.

1. I object to the development at Garlick's Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks' notice and without any prior consultation and is not required in terms of housing need either for the village or the The existing planning permissions within the village do not appear to have been taken into account in the figures set out by the council.

1. I object to the proposed industrial development of 7,000 sq m at Garlick's Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available and with plans for enhanced road access to make it more accessible.
2. The proposed new interchange on to the A3 will increase the traffic problems in the Send/Ripley The A3 and A247 are both at capacity (and probably beyond) and any small incident on either road can cause massive disruption on the surrounding roads. An accident or roadworks on the A247 can cause gridlock throughout the roads surrounding Send. The A3 is frequently at a standstill from the University interchange north to Burpham or Burnt Common and often as far back as the M25 in the event of accidents. The Transport Evidence in the Draft Plan is incomplete and shows that the A247 will suffer further congestion as Send would be used as a cut through to the A3/M25.
3. Many of the local roads, including large sections of the A3 and A 247, are in a state of disrepair with the road surface in an appalling condition in Further traffic would cause more damage to the surface, and the current practice of patching only increases traffic problems through congestion - but does not relieve them.
4. I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford's urban brownfield areas which are much closer to existing transport.

5. I object to all the proposed sites in Send because they were not included in the previous consultation in 20. Unlike the rest of the borough, Send has not been properly consulted and all its sites have been changed substantially - there exists a suspicion that this might be due to Send having had the temerity to elect a councillor from a group hostile to the council's proposed plans for the Green Belt. If correct and evidenced, then this would be further grounds for prosecution of individuals for misconduct in public office.

6. I object to building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic, especially large vehicles. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more, and probably will not be able to cope with what will be generated from those developments already given permission without casualties.

1. I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

1. The sewage network in Send is already at overcapacity due to previous development being allowed by the council without due consideration of the Thames Water or their contractors are regularly called out to the main sewer through Send to unblock it and a number of properties along Send Road (including ours) have had waste spills in the gardens because of blocked sewers.
   - The heavy traffic through Send has been blamed by contractors from Thames Water for collapses within the main sewer along the The increased use of the road by HGV traffic has increased the vibration on the road and the sewer is in sandy substrata which is susceptible to problems from vibration.

1. Any increased risk of flooding in the Send area raises the prospect of houses becoming unusable, uninsurable and unsaleable as a result of the wilful destruction of the delicate Green This is negligent at best and a criminal dereliction of duty while in public office at worst.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. Highways England have already indicated that the A3 is at overcapacity, having objected to further parking at the Royal Surrey County Hospital on the grounds that it would increase traffic problems on the Any proposed development outside the town boundary will just put further pressure on the local road network.

1. I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing Roads, doctors and schools will be unable to cope and there are already problems with GP access and school places.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/15058  **Respondent:** 11095905 / Joanna Holden  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. Legality of Insetting of Villages from the Green Belt
2. Current case law in England is that any removal of land from the Green Belt for any reason and by any means is illegal unless there are special circumstances This is also set down in the various planning frameworks. Insetting from the Green Belt for the purposes of freeing up land for building without special circumstances has been declared illegal in previous court judgements.
3. No special circumstances are set out in the Draft Local Proposing or following a course of action known to be illegal should be cause for investigation of those involved for misconduct in public office.
4. I specifically object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and With no special circumstances given in the Draft Plan, the insetting of Send from the Green Belt would be illegal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/15059  **Respondent:** 11095905 / Joanna Holden  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including the land at Wisley Airfield is adjacent to land with endangered species- and any development could harm those species.

1. I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity. Any development of housing should take place within the bounds of the Guildford Urban Area where sufficient public transport exists (the council having cut public transport out to the villages) and could be used by. The very last thing that is needed is housing where the occupiers would require cars for commuting as that will just make the traffic problems in the area worse.

1. I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4266  Respondent: 11095905 / Joanna Holden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Policy A42, the development at Clockbarn in Tannery Lane because it is too large a development for the village and will: increase the traffic problems on the A247 through Send, ignores the many previous objections, will make surface water flooding worse in the area and will impact on views.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4267  Respondent: 11095905 / Joanna Holden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Policy A43 for land at Garlick’s Arch as it will increase traffic congestion on the A3 and A247, both of which are susceptible to gridlock at the slightest incident. It is also on ancient woodland, has no proven demand for development of this type.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4268  Respondent: 11095905 / Joanna Holden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Policy A58 for land at Burnt Common as there has been a decline in demand for industrial land since the original plan, not an increase. There is land already available at Slyfield and in Guildford itself for industrial use of the type proposed so there is no need for this development. The extra traffic from any such development will lead to traffic gridlock on roads that already suffer gridlock at the slightest incident.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2580  Respondent: 11095905 / Joanna Holden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Any development in and around Send will need to take into account the lack of public transport at commuting times of day and allow for multiple vehicles for each house or development leading to an exponential increase in traffic in an already busy and over stretched road area and would lead to further instances of gridlock.

There is no provision for schools, road improvement or other services such as GP services in the Send area where such services are already at breaking point. Until the services are improved there should be no further development.

Surface flooding is already a problem in the Send area. While much of the village is slightly above the current flood plain, this is marginal and roads are subject to surface flooding as a result of existing development. Any further development in and around the village will increase both the flooding and surface water flooding risks.

We have recently received notification from the local water supplier that water supplies are under pressure after a drier than usual winter. That is with current levels of building. Any further building and development in the area will both increase
the demand for water while increasing the flood risk and decreasing the amount of water entering the ground and thus leading to aquifer depletion and drought risk.

Overall, the changes to the Local Plan are disproportionately increasing development in Send and the surrounding area at the expense of the Green Belt while ignoring the large stock of brownfield sites within Guildford itself. Those sites should be used before any development on Green Belt or before removing areas from the Green Belt for development. We strongly object to these changes to the Local Plan and urge that they be rejected and the development moved to brownfield sites, of which the borough has an ample sufficiency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4440  Respondent: 11096161 / Janice Perry  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the building of 45 houses at Clockburn Nursery.

Planning permission has already been granted for 64 apartments and a Marina, both of which were widely opposed by the local community. The inadequacy of Tannery Lane and the nearby roads to cope with the additional traffic caused by this unwanted development must not be compounded by adding even more traffic if the Clockburn Nursery development is granted. This over-development must not be allowed to happen if we are to avoid appalling traffic destroying the enjoyment of this quiet village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4437  Respondent: 11096161 / Janice Perry  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to building 7000 square metres of industrial space and 400 houses at Garlick's Arch, opposite Send Marsh Road (A43).

The industrial space is not needed and should be either located at the Burnt Common site, that should be restored to its brown-field status, or to the excellent facilities at Slyfield. The housing requirements for Guildford have been grossly exaggerated and not openly disclosed. There are numerous brownfield sites that should be used for future development. Only when these sites have been exhausted should alternative sites be considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4438  Respondent: 11096161 / Janice Perry  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a new interchange with the A3 at Burnt Common (A43a).

It will draw in a huge amount of ‘through’ traffic from the A3 and M25 causing already excessive traffic through Send to become gridlocked. There would be no way for this to be avoided and would also cause appalling deterioration to the air quality

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4439  Respondent: 11096161 / Janice Perry  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development of 40 houses and 2 travellers' pitches at Send Hill.

The narrow width single access road provides insufficient access and the subsoil of the proposed site contains unsafe landfill waste that has been documented and registered at the GBC. This high amenity area set in beautiful countryside is an inappropriate location for this proposed development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/9679  Respondent: 11096161 / Janice Perry  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to not protecting the Green Belt (Policy P2)
It would be a tragedy to remove Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) as this would result in an urban sprawl that would utterly destroy the character of the area. Successive governments have continually supported the retention of the UK’s Green Belt that is particularly necessary in the outer reaches of London. The alternative would lead to London sprawl extending to beyond Godalming. This must be avoided at all costs. There are more than enough brownfield sites in the Guildford area that should be developed for the Plan.

There are no exceptional circumstances for these villages and sites being removed from the Green Belt, as required by the National Planning Policy (Policy P2).

Central Government state clearly that housing need is not an exceptional circumstance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9680  Respondent: 11096161 / Janice Perry  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do hope these objections will be considered positively. It is important to emphasise that I am not opposed to build much needed housing in the Guildford area but this can be achieved by sensible and extensive use of brownfield sites and the re-development of existing poorly utilised/run-down residential area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

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<th>Comment ID:</th>
<th>PSLPP16/4685</th>
<th>Respondent:</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing with regard to the proposed Guildford Borough Draft Local Plan with particular reference to the Horsleys. I strongly object to this part of the plan.

Although I have only permanently lived in West Horsley since the year 2000, my connections go back to the 1950s when my grandparents lived in the village and actually owned and ran the West Horsley newsagents in the 1940s. Over the last fifty to sixty years there have been changes, but not massive ones. The character of the Horsleys has remained roughly the same, although property prices have forced many local youngsters to move on and out of the area.

The local West Horsley Post Office and Newsagents was recently converted into a flat and is currently on the market for £385,000. How many first time buyers could manage this? Are the proposed houses going to be any less pricey? Furthermore, with the Post Office disappearing, local shops for the proposed build on the Bell and Colvill site (A37) are dwindling. There also seems to be an access problem with this site and we received through our door a note from a company, that seem to have acquired the site, called ‘Dandara’ encouraging us to give our support to a development on this site on the grounds that it is surrounded by existing development, on a strategic highway route, on low quality Green Belt land, visually self-contained and protects the use of higher quality Green Belt land elsewhere. Surely this sort of approach cannot be encouraged and if 40 homes are proposed for this site and Dandara build, of what type will they be? The product which “reflects and draws upon the architectural character of the local area” quoted in the Dandara flyer could mean anything.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
A further worry with all sites is that if the plan goes ahead there is unlikely to be much in the way of affordable housing, and consequently there will be an influx of high earning commuters which will continue to change the nature of the villages. This will add to the local traffic problem and on a wider scale the A3 and M25 roads will be subjected to increasing congestion at a time when for parts of the day both of these roads are unable to cope comfortably with traffic volumes. There will be further problems with other amenities. The area is not blessed with unlimited school places, the Medical Centre in East Horsley is fully stretched and it will be necessary to massively improve the drainage system.

The Hotel site (A36) is very near to Horsley Towers and is likely to be extremely visible. The roadway around is potentially dangerous.

The four sites clustered around the Raleigh School area (A38, A39, A40 and A41) would be a total of 445 homes. This would constitute an enormous increase in the size of the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4688  Respondent: 11096897 / Rob Workman  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
Answer (if comment is on questions 1-7 of the questionnaire): ()  
Furthermore, the plan diminishes the rural character of the Horsleys and reduces flora and fauna habitats.  
I hope that my views and concerns will be considered.  
What changes (2016)/further amendments (2017) do you suggest should be made to the document?  
Attached documents:

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Comment ID: PSLPP16/4686  Respondent: 11096897 / Rob Workman  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
Answer (if comment is on questions 1-7 of the questionnaire): ()  
Furthermore, the plan diminishes the rural character of the Horsleys and reduces flora and fauna habitats.  
I hope that my views and concerns will be considered.  
What changes (2016)/further amendments (2017) do you suggest should be made to the document?  
Attached documents:
It appears that six sites have been earmarked for development, but there are both general and specific problems with each.

A major general concern is that the Horsleys will be removed from the Green Belt. If this occurs it is likely to open the flood gates to all developers and village life will soon be no more. All sites are currently privately owned and probably as a consequence if any go-aheads are given profit will be the driving force rather than sympathy to the locality and current resident population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/299  Respondent: 11096897 / Rob Workman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Being connected with West Horsley for over 60 years and living in the village since the year 2000, seeing what is proposed fills me with concern. My grandparents, who actually owned and ran the village newsagents in the 1940s, would be dismayed to find that our local shops have dwindled and no longer is it easy to visit a post office or buy essential groceries.

The residents of the 40 new homes lined up for the Bell and Colvill site (A37) adjacent to the old village parade of shops will no longer have the convenience of shopping facilities on their doorstep.

East Horsley would increase massively should the 445 homes clustered around the Raleigh School area (A38, A39, A40 and A41) be built. The infrastructure to cope is certainly not in place.

Difficulties ahead continue to mount if the Draft Plan for the Horsleys is implemented. Local roads are already overcrowded and at peak times the congestion is so bad that an increase in traffic, which will certainly result if the Plan for the Horsleys and other developments in the offing come to fruition, will bring local roads and the A3 to a standstill. Furthermore, the Horsley Medical Practice, which is already under strain, will have to increase its waiting times for an appointment and local schools will quickly fill, resulting in long treks to alternative suitable schools, if any can be found. The entire drainage system will be swamped.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3894  Respondent: 11097153 / Rupert Eastell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
My other comment is that the Plan is based on a "target housing number" which is substantially greater than expected population growth in the Borough. If this is deliberate in order to find a compromise then the whole Plan should be thrown out. Your Plan provides for a 35% increase in houses in a country village like West Horsley. That is clearly wrong on all counts.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/3893</th>
<th>Respondent: 11097153 / Rupert Eastell</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>It is clearly a complex matter which requires an appreciation of the quality of life enjoyed by many thousands of people in the Horsleys. This is at the heart of the very existence of the Green Belt and is what the Plan ignores. The Plan provides no basis for the removal of the Horsleys from the Green Belt. You have simply not proven the &quot;exceptional circumstances&quot; required.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<th>Comment ID: PSLPA16/2841</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>With regards to the other proposed development sites within Send and the surrounding areas, the local facilities and infrastructure are currently unable to cope with the demand from the current population. An increase in the order of 1500 new resident in Send will have major implications on the following.</td>
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<td>• There are currently major delays and traffic queues through Send and at all junctions at both morning and evening peak times which can extend throughout the day as soon as any road works are introduced in the local area.</td>
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<tr>
<td>• The nearest secondary school is becoming increasingly oversubscribed from Guildford residents leaving a reduced number of places for residents of Send. This is leading to a situation in a couple of year’s time when there will be no places allocated to children in Send. Provision of good quality school places to meet the current</td>
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population requirements has been promised for years and is yet to be delivered. The planned increase in population will only add to this.

- The Village’s Medical centre already covers a large population over several small villages and the current situation regarding obtaining appointments is unacceptable due to heavy demand. The planned increase in population will only add to this.

As with all proposals within the local plan they are based on providing the best option to housing developers by providing the largest number of dwellings in one block to maximise the opportunity for their profit.

The focus and responsibility of the council must be to meet the housing need in the most sympathetic and sustainable way and ensuring the villages are not lost under new towns and all character is lost. The local plan needs to be re-drafted under these terms and opportunity for small development identified that will fit within the villages and where the village can influence the development rather than the development have a major detrimental affect on the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5865 Respondent: 11097409 / Neil Munro Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed Local plan, in particular the proposal for development of 40 dwellings and 2 traveller pitches, in Send Hill, Send.

The number of proposed dwellings is massively in excess of the level of development that the village can withstand and would totally change the nature of the village to the detriment of the existing residents.

As residents of [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] my family would be directly impacted by the proposed development in Send Hill and I object for the following reasons.

- The proposed number of houses on the site is inappropriate for the size of the site.
- The increased traffic from the dwellings will overwhelm the road and the associated Junctions with impact on risk of accidents and delays
- The construction traffic to build the dwellings will cause major disruption and permanent damage to the road and environment including damage to trees and hedges from the large delivery vehicles.
- There are already major problems with the main sewer drainage from properties in Orchard Way and Send Hills which will be compounded by the introduction of 40 new dwellings.
- The area identified is Green Belt and this must be maintained for future generations.
• The number of dwellings proposed would not allow space for sufficient and realistic parking allocations for a rural housing location leading to parking in Send Hill which is already a problem and further adds to delays in traffic and accident risks.

• The inclusion of Traveller pitches will have a detrimental effect on the areas for the following reasons.

[Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]

[Summary of redacted paragraph: Proposal has potential to result in social, economic and environmental impacts]

Where even a small number of pitch allocations have been provided it often leads to unofficial sites being set up locally and further travellers visit / locate to the area in an attempt to grow the provision and their community.

In these instances it has been seen that councils are either unwilling or unable to take enforcement action leaving it to residents groups to take action to resolve the issues.

The Send Hill cannot accommodate the transport of mobile homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4391  Respondent: 11097441 / Sarah Christmas  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to draft Local Plan and proposed development in East and West Horsley. Policy P2: Green Belt and the Countryside / Policy P1: Surrey Hills Area of Outstanding Natural Beauty (AONB)

The first line of Policy P2 states, “We will continue to protect the Metropolitan Green Belt against inappropriate development.”

We in this country and this county have spoiled many of our villages and towns by over development uncompromising housing built in a sprawl without consideration as to facilities and infrastructure and community. The ‘Green Belt’ saved some of our towns and villages and has meant that there are still many attractive places to live but we now seem set on spoiling those for the next generation. It is no surprise that areas that are not over developed or spoilt by sprawling housing estates and clogged up roads are popular places to live. Surely we must strive to replicate the kind of towns and villages people want to live in rather than spoiling what we have remaining by over development. The Green Belt is key to preserving attractive places to live and prevent overdevelopment and I totally object to changing Green Belt Boundaries which were laid down many years ago by national legislation. Guildford Borough Council have made no sound case to justify changing the boundaries and I cannot believe ‘planners’ have not learn from the errors of the past which instigated the concept of the Green Belt in the first case.

There are no exceptional circumstances or other justification made for the new Green Belt boundaries that will result from the proposed insetting of the two parts of the village from the Metropolitan Green Belt and as such the Green Belt & Countryside Study is flawed.
West Horsley's defined Settlement Area boundaries (ref 2003 Local Plan) DO NOT need to be extended. West Horsley is positioned on the north side of the North Downs, partly in the Surrey Hills AONB, it attracts a considerable number of recreational visitors (walkers and cyclists) through the seasons each year and if the area becomes more urban and the character changed it will not be enjoyed by our visitors let alone the residents.

In our villages we have convenience shops which are convenient because they are accessible. It is still possible to pop to the shops as parking is available and the traffic manageable. Further development in the village will hinder parking and drive local people to use larger out of town supermarkets as the convenience and ease of access of the local shops diminishes. This scenario is well documented in other area where local shops actually suffer and decline because of development. The Guildford Borough Economic Strategy 2013/2031 makes no case for siting large numbers of residential homes in West and East Horsley and I would argue on the contrary it may well have a negative impact on the local businesses that exist.

The villages infrastructure with narrow roads limited shops parking cannot sustain extensive additional housing. The village will be spoilt by the kind of high density housing proposed which will ruin the attractiveness and character of the village. The need claimed for so many extra houses has not been proven.

We chose this village to live and bring up our children because of the semi rural fee. This is our home and it is not easy to up sticks and move into more rural surrounds not least because of the prohibiting stamp duty rates but also because of the ties we now have in the village. However the development proposed will alter the character and feel of the village for ever and mean it is no longer the kind of village we choose to live in, a different more urban environment will be forced upon us.

All the local facilities are over burdened including library, medical facilities, station and parking, schools. The villages cannot cope with significant additional housing on Green Belt, even the infill which has been allowed and is being permitted at an alarming rate has impacted the availability of essential local facilities without adding significant additional housing on the Green Belt.

The roads become clogged and key times and additional traffic will cause gridlock. The roads are narrow country lanes with narrow pavements not built to sustain significant volumes of traffic and in many cases there is no opportunity to widen and make it safe for pedestrians and car users.

The Secretary of State has stated and re emphasised that it has to be very special circumstances to justify inappropriate development in the Green Belt and yet Guildford Borough Council have made no case for the special circumstances.

Removing our villages from the Green Belt must not be allowed to occur, we have a duty to preserve the village and country side for our children.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPS16/3355  **Respondent:** 11097729 / Sheila Brown  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
Objections for Policy A25

I object to the proposed wholesale destruction of Green Belt land at Gosden Hill. This must surely be illegal?

I object to the proposal to build 2000 homes at Gosden Hill Farm, Merrow. The infrastructure of the area cannot sustain such a development. Brownfield sites closer to Guildford should be used first. It must make more sense to enlarge a town where facilities already exist, than to erode the countryside which everyone can enjoy.

I object to the 8 Travellers pitches included in this proposal. Eight pitches together would form a separate specialist site. How acceptable would this be to householders nearby owning their own property? Guildford was committed to providing a separate site for all Travellers to their area a number of years ago. What happened to that commitment? [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Objection to AJS

I object to the continual inclusion of the plan to build 2000 houses on the previous Wisley Airfield. The proposal has already been unanimously rejected by the GBC Planning Committee and that decision should be accepted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3357  Respondent: 11097729 / Sheila Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Finally, Objection to AJS

I object to the continual inclusion of the plan to build 2000 houses on the previous Wisley Airfield. The proposal has already been unanimously rejected by the GBC Planning Committee and that decision should be accepted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3351  Respondent: 11097729 / Sheila Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Objections to Policy A42

I object to the proposal to build 45 houses on Clockbarn Nursery for the following reasons. There could be another 90 odd cars on the road, and the nearest road to join would be the already crowded Send Road. The other roads are narrow country lanes which join up with a network of other narrow country lanes.

Oh! Yes! And these lanes will also be shared with the new marina on the river Wey in Tannery Lane, Send that has already been granted planning permission for 80 berths plus the buildings that will support that project.

I object to the increase in the population (together with other housing proposals) that will put additional strain on the educational and medical facilities in the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3348  Respondent: 11097729 / Sheila Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The next objections are for policy A43 and A43a,

I object to the use of Green Belt land to build 400 houses and some industrial/storage space at Garlick’s Arch. Send would cease to be a village and become a suburb of Guildford.

I object to the creation of new slip roads into the main traffic areas. This would create more chaos to areas already grid-locked at peak travel times.

No need/or surveys to support this statement ... Just try being trapped on these main roads for hours in the blazing heat or freezing cold as already happens!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/3343  Respondent: 11097729 / Sheila Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Objections to Policy A44 the land west of Send Hill.

I object to the Green Belt area in Send being reduced in size or removed altogether. All Green Belt was supposed to be unchangeable by law. When it was set up originally, it was to control urban growth providing at the same time a ‘lung’ around London for the benefit of the people living in the capital. How can the air quality in London be improved if the Green Belt is gradually eroded with bricks and concrete?

I object to the number of houses being proposed ie 40. The site is not large enough. If you take the footprints of the 21 houses shown on one side of Send Hill only and put them on the area owned by the GBC they will not fit, and that is not even allowing for garden space!

I object to the inclusion of two Traveller pitches included on the site as being totally unsuitable both to Travellers and householders sharing the site [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]

I object to all the extra road traffic that such a project could bring to the village. Every household could have at least two cars and the congestion that that would cause on Send Hill and to the main Send Road, which is the only road to Woking, will bring chaos to an already overstretched system.

I object to the possible loss of a beauty spot which is only accessible at present by footpaths and which is enjoyed by people in the village and visitors.

I object to adding to the increase in the number of residents in the village (as there are other housing proposals throughout the village) because of the pressure on the already stretched medical and educational facilities in the village.

On the other hand a small development without Traveller pitches and in keeping with the surrounding properties could be a possibility

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2737  Respondent: 11097729 / Sheila Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A42 change at Clockbarn Nursery, Tannery Lane, Send, of 60 homes in place of the 45 homes previously proposed because
• it ignores the hundreds of objections already made by local people.
• it will make more traffic problems in Tannery Lane and at the A247 junction which are already overloaded at peak travelling times.
• The narrow country lanes there are already under threat from the development there where the GBC has already given permission to proceed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: pslp172/2739  Respondent: 11097729 / Sheila Brown  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43 chan2e at Garlicks'Arch, Send Marsh, Send, because
• it ignores all the thousands of previous objections made by local people to the housing,
• there is no proven demand for Travelling Show-people plots in this location.
• it is part of the Green Belt and no "exceptional circumstances" exist
• it will cause total over-development of the village because the number of homes is excessive.
• This could result in more traffic to cause mayhem on the local roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2738  Respondent: 11097729 / Sheila Brown  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A58 for land at Burnt Common, London Road, Send to now have a new allocation for a minimum, of 7,000sq m of industrial warehousing because
• this is really unnecessary when Slyfield and Guildford still have empty sites and industrial units.
• Such a development will have a significant impact on the surrounding roads and cause traffic gridlock which is almost at that point already at peak times.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1220  Respondent: 11097729 / Sheila Brown  Agent: 

Page 1388 of 2855
I object to Green Belt, Policy 2 at paragraph 4.3.15, which proposes to inset Send Business Park from the Green Belt because
• further expansion or development at this location will spoil the lovely countryside adjacent to the Wey Navigation and the surrounding Green Belt.
• Tannery Lane has very restricted access for vehicles in both directions and there would be serious travel restrictions on all the surrounding local roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I would like to comment on the Draft Local Plan 2017 (Reg 19) as follows and relate to the proposed extensive development in Ash, Tongham and Ash Green.

Of particular concern is extensive development to the east of Ash and north of Ash Green, and I note that Ash Green has effectively been split into two parts, the the northern part (north of the disused railway line) now being subsumed into Ash. Subterfuge on a grand scale.

It is at this point I would like to introduce page 2 from the NPPF. (attached file)

Observations

1. Just how will this plan deliver any of the 3 goals described above. Concreting over valuable green spaces, some of which is arable land, is not going to satisfy any of the three dimensions. In the 2013 Guildford Borough Settlement Hierarchy study Ash Green ranked last -score 31 for Sustainability and score 15 for Functional ranking. Meanwhile Normandy and Flexford scored score 5 and an 1 respectively in the same study. Ash Green had a population in this study of 593 and Normandy and Flexford scored 1794, both 2011 figures. Looking at the proposed development sites A27, A28 and A29 represents a environmental disaster on a grand scale. A29 incorporates part of Ash Green into what is a massive dense urban expansion, totally out of character and sympathy with the existing housing stock. The density of the proposed housing is on a scale that is more suited to inner cities. Tomorrows ghettos in the making. Taking into account the housing proposed around Ash Manor, Ash Green Road and the sites A27 and A28, Ash Green will more than double in size, whilst Normandy and Flexford emerge from this environmental disaster free of any significant development, despite the earlier plan having made provision for some housing which would have "spread the load".
2. When this proposed environmental catastrophe is complete I just wonder who is going to held to account. Not only will this monstrous scheme load the environment for the foreseeable future just how are the basic needs of water, drainage, air quality, services and recreational space to be provided. That most of the area in north of Ash Green is an effective sump to which precipitation drains has not been mentioned. That the soil is predominantly clay with poor infiltration is also conveniently ignored. That run off water will find its way to the Blackwater river, and though a SUDS system might help, the shear density of the housing and geography will make this very challenging indeed. What about the rail crossing on the A323 at Ash that is effectively closed for 23 minutes in every hour. The proposed road over bridge for the rail line is a mere proposal. Until this is realised then any development should be "on-hold" because the traffic load will simply overwhelm the carrying capacity of the road system. Ash Green Road will become the biggest rat run in Surrey, all because the planners at Guildford did not plan. With 1850 + houses planned in the ATUA and Ash Green how is the water supply going to be guaranteed. Add in the 4000 + homes in Aldershot that will be built in the same time frame and this will add a considerable burden to the water supply. Where are the the additional 750 million litres of potable water to be obtained?

3. What about the transport system and the choke points. A31 for example. Miserable at Farnham and Guildford at peak hours. Same for A331 at the A31 and M3 junctions. A323, a total disaster with multiple choke points. A3 in Guildford; a nightmare now, and even worse nightmare in the making. The rail network. Try getting seat at peak times. It is at full capacity now, how will it cope in the future. Since neither Ash, Tongham and especially Ash Green has limited employment opportunities any person living in this location has to travel to a place of work. That means loading the transport system for which there are limited options now and even more limited options in the future.

4. If we look at the future needs for social services, medical services, schools and recreational space these proposals fall well short. There is an acute need for housing suitable for elderly people yet this scheme pays scant attention to the issue. Land plots A28 and A29 would better serve the borough and be more sympathetic with the local area if development were restricted to provision of housing and green space for the elderly. This could be a mix of sheltered and purpose built housing. Current residents in Ash, Tongham and Ash Green have few options to downsize and stay in the area (see 2.2.1 of Draft Local Plan). Providing options to do this will release a variety of properties to the market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Stephen Bowers Fig.1.doc (157 KB)

Comment ID: pslp172/4104  Respondent: 11097953 / Stephen Bowers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A28

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Policy A28: Land to the east of White Lane, Ash Green
   - Correct title of Policy A28 to say Ash Green, and not Ash.
   - Policies A27, A28 and A29 collectively increase Ash Green village by over 100%. Opportunity exists under Policy A28 to provide a village/community hall and recreational area which would provide Ash Green with much needed community and social space and reduce the housing density.

Opportunities (1) Should read: "A mix of homes for older people (C2) would be most appropriate for this site."

Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4101  Respondent: 11097953 / Stephen Bowers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ) , is Sound? ( ) , is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **Policy A29: Land to the south and east of Ash and Tongham**

I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village, since taking into account the development that has already taken place, since the the start of the consultation the net gain in housing in the ATUA will be in excess of 2000 units. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the “historic location of Ash Green”, is insufficient and requires a more robust rewording to prevent this increased potential for coalescence.

1. **Policy A29: Land to the south and east of Ash and Tongham (Cont.)**

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”

- Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

> “Sensitive design at site boundaries and the avoidance of hard boundaries, in sympathy with the adjacent complex of listed buildings at Ash Manor need to be carefully and robustly implemented. Views to and from this heritage asset, including the approach from White Lane, must be protected.”

Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

- Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.

1. The Street in Tongham
2. A331/A323 intersection
3. A31/White Lane junction
• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2269  Respondent: 11097953 / Stephen Bowers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Policy P3 - Countryside

• Ash Green is not part of the Ash & Tongham Urban Area. The urban boundary of the ATUA is shown extending south of Foreman Road and east of Ash Green Road. This should not be allowed.

• 3.29 Amend to: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure improvements must be implemented before further development.”

• 3.30 Amend to: “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate and excessive over-development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

• Policy P3 Amend to: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1563  Respondent: 11098241 / Sammy Chalk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2971  Respondent: 11098241 / Sammy Chalk  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

I OBJECT to Policy A25 Gosden Hill as being totally a inappropriate and unsustainable development of 2000 homes in the Green Belt which will cause coalescence and urban sprawl from Burpham to West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2965  Respondent: 11098241 / Sammy Chalk  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2938  Respondent: 11098241 / Sammy Chalk  Agent:
<table>
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<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I OBJECT to the inclusion of strategic site Policy A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local. This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/2945  Respondent: 11098241 / Sammy Chalk  Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I OBJECT to Policy A43a, the proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/2959  Respondent: 11098241 / Sammy Chalk  Agent:</th>
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</table>
I OBJECT to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2953  Respondent: 11098241 / Sammy Chalk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6402  Respondent: 11098241 / Sammy Chalk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6427  Respondent: 11098241 / Sammy Chalk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6393  Respondent: 11098241 / Sammy Chalk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Guildford Borough Proposed Submission Local Plan (June 2016) as this plan is unsound, unsustainable, unworkable, flawed and in many instances, unnecessary for the reasons set out below:

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by over development in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6417  Respondent: 11098241 / Sammy Chalk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/3750  Respondent: 11098369 / Neil & Nicki Covington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

WE OBJECT to the proposed Infrastructure Schedule (Appendix C)
The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3751  Respondent: 11098369 / Neil & Nicki Covington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

WE OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)
The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is we believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3752  Respondent: 11098369 / Neil & Nicki Covington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Clandon
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

WE OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

From our personal perspective this plan is wholly unsustainable within the area. The area of West Clandon is already dangerously insufficient to support the local usage in place and adding more to this is a recipe for disaster. The roads are already dangerously over used by speeding vehicles and vehicles of excessive size. This itself needs to be addressed as a matter of urgency before there is a serious accident and any plans to increase usage disregarded completely.

As a regular footpath user both as a parent and a runner I am fully aware of how close I have already come to being struck by a vehicle when I am on a footpath and am of the opinion it is only a matter of time as to when this happens. Many of the proposals will only make matters worse.

Additionally as a country we need to protect the greenbelt and avoid our landscape becoming a single mass urban sprawl. The only way for this to happen is to respect the greenbelt instead of removing it. There are ample more appropriate sites for development including many brownfield sites that achieve this but are being ignored. Once the greenbelt is removed it is going to be almost impossible to reinstate it and rash decisions now are going to cause serious problems for generations to come.

Whilst these are a few of specific personal areas of objection we fully agree with the many areas also raised by others and include them below also.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7080  Respondent: 11098369 / Neil & Nicki Covington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

WE OBJECT to Gosden Hill development being in the Local Plan The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before
the urban area. If it is built on, it will be very difficult to construct a tunnel. The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools. Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day. Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost. There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size. Electricity supply is also inadequate and would require a big infrastructure development. The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London. The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants. The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley. If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.
Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.
National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).
The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).
This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).
The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)
It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)
Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

WE OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)
WE OBJECT to the local plan based on the impact it will have on the special countryside of the borough.
The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15859  Respondent: 11098369 / Neil & Nicki Covington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

WE OBJECT to the sustainable employment policy (Policy E1) 
If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.
The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15860  Respondent: 11098369 / Neil & Nicki Covington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
WE OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)
Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the
Industrial Strategic Employment Sites.
There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at
Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further
development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15861 Respondent: 11098369 / Neil & Nicki Covington Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

WE OBJECT to the loss of rural employment (Policy E5)
Policy E5 supports the retention and development of local services and community facilities in our inset and identified
villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses,
which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ
dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will
result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15868 Respondent: 11098369 / Neil & Nicki Covington Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

WE OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as
compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development
runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are
particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are
given. Instead, the plan’s explicit priorities should be:
1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the
more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents
are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15866  Respondent: 11098369 / Neil & Nicki Covington  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

WE OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

We support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London. Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15867  Respondent: 11098369 / Neil & Nicki Covington  Agent:
We object, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads. Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. We object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces. Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems. With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians. The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.
WE OBJECT to the lack of proper infrastructure planning for sites (Policy I1).
Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. We have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15864  Respondent: 11098369 / Neil & Nicki Covington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

WE OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2).

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. We have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15865  Respondent: 11098369 / Neil & Nicki Covington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
WE OBJECT to poor air quality concerns (Policy I3)
Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/15857</th>
<th>Respondent: 11098369 / Neil &amp; Nicki Covington</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

WE OBJECT to not protecting the Green Belt (Policy P2)
WE OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.
There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.
Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
WE OBJECT to development in areas which are at risk of flooding (Policy P4).

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well we are aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15855  Respondent: 11098369 / Neil & Nicki Covington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

WE OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1).

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further
vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15856  Respondent: 11098369 / Neil & Nicki Covington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

WE OBJECT to the Borough Wide Strategy (Policy S2)

a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.
b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market. These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green. Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.
12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.
13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.
14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.
15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/552  Respondent: 11098369 / Neil & Nicki Covington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4491  Respondent: 11098977 / Jilly Cooper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt.
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity.
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4492  Respondent: 11098977 / Jilly Cooper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches.
2. It ignores all the thousands of previous objections made by local people.
3. There is no proven demand for travelling show people plots in this location.
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.

6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green belt be intent on conserving it rather than exploiting it.

7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.
18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357 sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607 sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750 sqm of B1a use class floorspace and a net gain of 38,357 sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357 sqm.
10. The impact on small surrounding roads will create traffic gridlock.
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12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2923  Respondent: 11098977 / Jilly Cooper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp17q/565  Respondent: 11098977 / Jilly Cooper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13596  Respondent: 11099169 / Ben Fraser  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Schools:

Local schools are already at capacity and I am aware of several friends who have been unable to secure places at the schools closest and most convenient to them. Where will the additional children go to school?

Doctor’s Surgery:

It already takes between 7 and 14 days to obtain an appointment at the Horsley Medical Centre. With no additional medical facilities planned, this will create completely unsustainable pressure on already stretched facilities.

Local Road Network:

It seems that the Plan is proposing a strategic site at Wisley Airfield without even knowing what improvements to the local road infrastructure will be required. If that is the case for Wisley Airfield, then it is almost inevitably true for the proposed developments in East and West Horsley as well. The local roads and parking at facilities such as Horsley station are already under significant pressure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13597  Respondent: 11099169 / Ben Fraser  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Loss of Greenbelt Land:

It is of paramount importance that we continue to protect our green belt and open spaces, especially when there are brown field sites available in the UK for development.

This is to say nothing of a raft of other concerns ranging from policing to pollution and potentially increasing the flooding risk. I urge you to rethink the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3519  Respondent: 11099233 / Alex Carr  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
As a local resident I feel I must make a strong objection to these proposed developments in the Send and Send Marsh areas. I wish to object to the following:

- I object to all erosion of the green belt
- I object to site A43 Garlicks Arch
- I object to sites 43a the on and off ramp at Clandon – this will seriously increase traffic problems through Ripley and Send and not alleviate them
- I object to site A45 The Talbot – I consider this to be over development in a conservation area
- I object to site A57 The Paddocks
- I object to any removal of any villages from the green belt
- I object to the disproportionate amount of development in one area of the borough. The roads around this area are not capable of carrying the amount of traffic which this sort of development would bring; Send is already burdened with traffic and local transport problems. There is also a lack of parking at local stations already without adding additional cars.
- I object to the limited consultation period
- I object to the last minute inclusion of new sites with less than 2 weeks notice
- I object to the lack of evidence for the alleged housing need numbers
- I object to the lack of immediate provision for new schools and doctors surgeries. The local state schools are already oversubscribed and this will only get worse and Doctor’s appointments are already over-subscribed

I AM STRONGLY OPPOSED TO THE ABOVE AND RESPECTFULLY REQUEST GUILDFORD BOROUGH COUNCIL PLANNING COMMITTEE TO RE-CONSIDER THIS IN THE LIGHT OF ALL THE VALID ARGUMENTS THAT HAVE BEEN PUT BEFORE THEM.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Draft Guildford Borough Local Plan – Consultation Response.

We write as residents of Ash Wharf having attended the public exhibition at the Ash Parish Centre on Saturday 30th September 2014 and subsequently have examined the emerging local plan in this consultation. It is of considerable relief that the Borough Council has finally decided to progress with a new Local Plan, some 10 years after the Planning and Compulsory Purchase Act (2004) first introduced the Local Development Framework style of development plans. The current Guildford Borough Local Plan is woefully out of date and not consistently compliant with the National Planning Policy Framework (NPPF) so any new local plan will be welcomed. However, even after almost 12 years of potential works and drafting, the consultation draft on the Local Plan appears rushed and unduly politically influenced.

As residents of the greater Ash settlement area, we have identified the following issues that have not so far been addressed by the Council in the draft plan and which, if strategically approved at this stage, will leave little scope for further input or changes in approach. We have identified the following areas of concern:

- The Level of residential development to be provided in Ash and the lack of co-ordinated approach to development both in site specific terms and as part of the duty to co-operate with other local authorities
- The impact of development on the local highway network
- The inappropriate provision of Sustainable Alternative Natural Greenspace (SANG) so close to the Ash Ranges

Each of these points are addressed in more detail in the remainder of this letter.

Residential Development

Ash is in the position of being located on the Guildford, Rushmoor, Waverley and Surrey Heath borders. In its Core Strategy, Rushmoor Borough Council has already identified a large housing development in the Aldershot Military Town. Waverley is currently working on a new draft Core Strategy Local Plan having fundamentally failed the test of the duty to co-operate with other Authorities. This same duty of co-operation appears to be missing from the draft Guildford Local Plan. It is clear that Waverley Borough Council are focusing considerable development onto Badshot Lea. With the planned development at Aldershot and then the suggested housing allocations at Ash and Tongham which have been published in the draft Guildford Local Plan, there appears to be little, if any, consideration of the cumulative impacts on this cross border location.

We suggest that the Council has taken the easy and politically safe option to force high amounts of development on the Ash area and we urge the Inspector to give this apparently unjustified approach some proper consideration when examining the emerging Local Plan for soundness. The promise of additional Green Belt in the Ash/Tongham area is a token gesture aimed at distracting local residents of what the main plans are for the area.

Local Highway Network

The SA identifies the current issues on the road around the existing pinch point of the level crossing at Ash railway station. This regularly causes traffic to tail back almost a mile to the Guildford Road/Pirbright Road junction on the A323. This part of the highway network is already well beyond capacity (as identified within SCC’s Transport Assessment, January 2014 which makes up part of the evidence base for the Local Plan) and therefore any additional traffic will exacerbate the existing problem unless there is a co-ordinated approach to future local infrastructure provision which, in our opinion has to include a new bridge over the railway between the developments to relieve the traffic demand on the existing level crossing.

There are also no guarantees that the highway impact of the proposed Ash housing development can be mitigated and, unless this can be proved otherwise, the LPA could find themselves in the position of not being able to deliver on its housing allocations. Unfortunately, the more likely event is that the LPA will conclude that the houses have been strategically allocated and therefore must be delivered regardless of what associated infrastructure is offered.

The evidence base for the draft Local Plan should be used as a tool to assess what the impact of the proposed allocations should be and then the LPA should assess and plan for the mitigation before any acceptance that the housing allocation should be pursued and formally allocated. This process has fundamentally failed in this instance and the LPA has not completed sufficient work to establish that they can sustainably deliver the quantum of development proposed in Ash. It is further noteworthy that the settlements in the east of the Borough have no road links identified as being over capacity.
All the links over capacity are those where the development is being proposed. We have already alluded to the probable reasons for this.

Allocation A30 suggests a road bridge over the railway at Ash Station, something our earlier representations focused on. This is essential if significant residential development is to be allocated. The suggestion is another 30 seconds per vehicle without mitigation – effectively gridlock. However, how is it going to be delivered? S123 of the CIL regulations refer to pooling and the restriction to 5 sites to contribute towards a pot of S106. On the basis that multiple sites in Ash are going to be allocated, S106 will not be able to deliver the road bridge with genuine concerns that individual developer/land owners will seek to pass-the-puck to prevent paying for the new infrastructure. If the time to produce this local plan is taken as an indicator, the Council cannot rely on CIL to deliver the road bridge in the near future. Surrey County Council’s Strategic Highway Assessment Report (June 2016), 4.5.3 confirms that the mechanism for mitigation must be agreed at Examination Stage. We agree with this, it cannot be left to the developers to deliver the infrastructure. If the footbridge and road bridge are going to be delivered as an allocation of its own right, then how is this to be delivered? It needs to be linked to the development themselves otherwise they could easily fall to the wayside and not be delivered.

Ash Hill Road will reduce to Level E (number 24 northbound). The information is unclear as to what is being proposed to mitigate against this. Again, referring back to 4.5.3, this should be agreed prior to the EIP otherwise there will be no mitigation.

The A323 (Guildford Road) and B411 (Ash Hill Road) suggest traffic signals yet “they are unable to be represented in the strategic SINTRAM”. Why not? This is not explained. It appears an unwillingness to model this.

The A323 Guildford Road in Ash has a Ratio of Flow Capacity (RFC) of 1.18 and a corresponding level of service F (the lowest value possible). In the scenario 3 “do something (2031) the RFC goes up to 1.35 with development appropriate mitigation. This is not providing a do-nothing situation. It is inappropriate to put added stress on a road with and RFC of 1.18 in the first place, let alone with no commitment to mitigation.

If you are putting this much development in Ash, then top of the priority list is understanding the highways implications of the proposal. For instance, as another example, the A323 and A324 junction is forecast to have a 112 second delay increase per vehicle. There appears to be no understanding from the Council of the implications of this level development, let alone how it will be mitigated.

Schools

Ultimately 2,300 new homes are proposed within 1 mile of each other at Ash, Flexford and Normandy. Whilst a new Secondary school is proposed in Normandy/Flexford, no new primary/junior schools appear to be proposed. This is essential with the existing primary schools full in the local area.

Conclusion

We are not against the principle of new residential development in the Ash area and understand that all settlements potentially have a duty to provide more dwellings. That is why it seems unreasonable and unjustified in planning terms that the Borough Council is clearly focusing as much development outside Guildford itself and the affluent villages to the east of the Borough with the focus on development to the western end of the Borough. This is being done with no evidence of satisfying the duty of co-operation with the neighbouring boroughs and clearly following political desire to focus development in the east of the Borough. This has apparently unduly influenced the draft plan to the extent that strategic housing sites are being suggested for allocation in the Local Plan without the appropriate evidence base to back up their allocation or even prove that the impacts of development have been considered. On this basis, it is highly likely that an Inspector will find the draft Local Plan unsound on submission. The LPA has had 10 years to do the required background work and it is alarming that they would be willing to strategically allocate 1200 houses without properly identifying how these will be mitigated on a road network which the Council’s own evidence base shows cannot take any more traffic at peak times. The commitment to the new road bridge at Ash Station is weak and there appears little chance of it being delivered as an allocation in its own right. Developers should fund the whole bridge and there should be no reliance on Network Rail or Surrey CC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The plan has been based on the intention of adding 13,860 new homes to Guildford Borough over the 2013 - 2033 period, this represents a massive increase of 25% of the housing provision in just 20 years, the need for this huge increase has not been explained or justified, as neither has the basis on which the SHMA has been calculated. It is also the case again without justification that GBC has enhanced this figure to a level which is 70% higher than the official national estimates for population growth than the Borough. The GBC has no mandate from its residents to provide this additional level of housing and therefore has completely departed from the ethos of “localism” in planning policy.

The effect of Brexit will be to reduce the demand for housing nationally and the ability of the building industry to provide it, making GBC’s figures even more extraordinary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I also object to the Local Plan proposals for any significant increase in the population of the Horsleys, Ockham, Ripley and Send. Notwithstanding the effect of proposed development in these villages the provision of over 2,000 homes on the Former Wisley Airfield will add some 5,000 to 6,000 people to the area and probably 3,000 or more extra vehicles. This new community will need to get to their workplaces and schools and as there is no train station proposed for Wisley Airfield they will have to travel by car either by driving to Guildford or London or to the train stations at Horsley and Cobham. This will involve them accessing the A3 where the 3,000 vehicles would first have to go south to the Ripley/Ockham junction before going east to Horsley Station or north to London and Cobham.
At the present time at rush hour there are often queues northbound between the Ripley/Ockham roundabout and the Cobham roundabout and the addition of a further 3,000 vehicles at this time would cause these roundabouts to seize up and effectively close the A3. Those motorists lucky enough to complete their journeys via the A3 will find that there will not be any spare car parking at either of the stations (where there is no room to extend either the car parking or the platforms) and even if by chance they did find a space in the car park they probably would not find one on the train.

In the villages most of the primary foul water, surface water, electricity, gas, and telephone services are 80 or more years old, close to capacity and near to the end of their effective life. My personal experience of this is that in the six years that I have lived in Ockham Road South East Horsley the electrical supply to my part of the road has failed twice, once for five days and the second time for two days due as the electricity supplier told me, to the age and capacity of the mains cables.

Although new energy saving technologies and elements like sustainable underground drainage systems can to a degree reduce the impact of any new developments ultimately they still have to be provided with services form the existing primary utilities infrastructure which will not be able to cope or be renewed by the monies obtained from the anticipated community infrastructure levies.

Other resources which will be overwhelmed will of course be the local healthcare services (where appointments are already difficult to get) and many will be aware of the near impossibility of parking at Royal Surrey County Hospital. It is also the case that most of the local “country” roads already have difficulty in withstanding the onslaught of potholes following each winter, without the added attrition of 100’s of heavy good vehicles which will be unleashed when any significant development works start.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13860  Respondent: 11100033 / Penny Orpwood  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object to the classification of the East Horsley Station Parade as a designated “District Centre” this is pure artistic licence by the Plans authors, it is just a small shopping parade.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13858  Respondent: 11100033 / Penny Orpwood  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt, and its inclusion in the Local Plan as a site suitable for development. This site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. The proposed removal of this site from the Green Belt by GBC only a few months after Wisley Property Investments Ltd.’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers is totally hypocritical, lacking in logic and integrity, and would seem to indicate the existence of an unduly coercive influence by the associated developers on some council members.

From what I have seen of the Local Plan Guildford’s planners, councillors and external consultants seems to have forgotten (or not be aware of) what gives the Borough and Surrey as a whole its unique character and the attributes which currently make it one of the most desirable places in the country to live in.

The first of these is of course that a good proportion of the Borough and indeed the county is countryside protected by the Green Belt, a piece of planning legislation which has given London its “Lungs” and prevented an unrestricted urban sprawl envied by most of the world’s capital cities.

The second is that quintessential element of the British countryside, small villages dotted about the county each with its own character, vernacular architecture, church and village green and individual communities.

The third attribute is the space that we enjoy by choosing to live in a rural and not an urban environment.

The proposals shown in the Local Plan spell out the destruction of what causes this part of Surrey to be unique and will devalue the quality of life of many of the Borough’s residents particularly in the Horsleys, Ockham, Ripley and Send.

5) For these reasons I also object to the proposed extension of the Settlement Boundaries of the Horsleys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13857  Respondent: 11100033 / Penny Orpwood  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2) I object to a plan which proposes that over 70% of the new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are for no good reason being forgotten and ignored.

3) I object to the disproportionate allocation of this new housing in this particular part of the borough which means that over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the paucity of the evidence base. The submission documents are unsound, unreliable and inconsistent. The current SHMA inflates the proposed housing figure due to the following factors: the failure to correct for errors in the historical data for international migration flows; the way it inflates the requirements of students; and the flaws in the method for estimating the number of homes needed to support job growth. The Green Belt and Countryside Study does not look strategically at options for development in major settlements beyond. The Green Belt sensitivity analysis is not a valid basis for informing decisions. Exceptional circumstances do not exist to justify amendments to Green Belt boundaries as part of the Local Plan process. It is quite achievable for realistically prepared and identified development needs to be accommodated in Guildford’s urban areas and villages. The Transport Evidence has been produced very late and is incomplete, inaccurate and untested to the extent that the Plan is not ready for a Regulation 19 consultation. It is apparent that the Strategic Highway Assessment shows there will be congestion, even with all the highway schemes in the Plan. The available evidence suggests much of the proposed Sustainable Movement Corridor cannot be delivered due to narrow roads and pinch points. Evidence on bus travel is compromised because no clear location for a bus interchange is proposed. No information has been provided on the demand for and capacity of rail services, and the main line to London is already extremely busy in peak periods. Information about the town centre as regards traffic, buses and parking is lacking. The Strategic Highway Assessment 2016 is flawed. It is invalid to base this on less traffic growth than the proposed housing growth. The report points to overcapacity use of the A3, M25, A31, A320, Millbrook, Ladymead, Woodbridge Road, York Road, London Road but understates the congestion consequences. Various suggested queue reductions are unexplained. The consequences of major proposed reductions in road space in the town centre (eg closure of Walnut Tree Close, narrowing of Woodbridge Road, reduced capacity of the gyratory) and of developing Burnt Common are not included. The Guildford Retail Study Update lacks credibility and there is no proven case for expanding comparison retail space which is undermined by failure to implement existing retail consents at the North Street development over the last 10 years. The Guildford Retail Study does not take account of changing retail patterns in relation to the threat of the internet and the study also assumes a number of logged retail requirements from companies already in liquidation or with national requirements that exclude Guildford. Key parts of the evidence are missing, flawed or based on withheld assumptions. The Strategic Housing Market Assessment overstates need, the Green Belt and Countryside Study uses a flawed approach and the Transport evidence is too late and incomplete to be relied upon to inform the Plan. The Plan preparation process has had inadequate regard for national policy which attaches “great importance” to the “openness” and “permanence” of Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level. The Sustainability Appraisal seems to have lost sight of the concept of Sustainable Development as described in the National Planning Policy Framework to the extent that we question whether it complies with the requirement. It is unacceptable to treat Green Belt as a readily available source of development land during Plan preparation. The Mayor of London intends to respect Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level. Releasing Green Belt to fund infrastructure or build on open, previously-developed Green Belt does not pass this test. Opportunities to channel development towards brownfield locations beyond the outer Green Belt boundary, linked to sustainable transport, have not been adequately considered. It is not credible to suggest the Green Belt is being treated as permanent when its boundary was changed as recently as 2003 as part of the last Local Plan review. Indeed, land released in 2003 is neither fully developed nor efficiently used. An approach of eroding the Green Belt at each Local Plan review is not sustainable. If there is a case for Green Belt development, it needs to be proven through the application of policy. Guildford is physically constrained being a gap town set in the Surrey Hills AONB and in Metropolitan Green Belt. Significant parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, groundwater and surface water flood risk. Constricted road and rail routes converge to cross the downs seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach. The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. GBC have failed to apply any reduction
which makes the plan undeliverable and unsound. It would be harmful to the character, quality of life and economy of Guildford not to reduce the housing figure to a number significantly below 13,860 new homes by 2033. It would be counter to sustainable development as a whole (in particular to living within environmental limits and achieving a sustainable economy) and contrary to government policy to develop on the scale currently proposed. I am concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site. The extent to which the Sustainability Appraisal fails to test the sustainability of the spatial options in a meaningful way casts doubt over whether sustainability has been assessed. The report treats various major development sites in Green Belt, contrary to the importance attached to protecting Green Belt, as “a given”, fails to consider options that constrain development or that make greater use of brownfield or previously released greenfield land, focuses on a range of options that involve developing on even more Green Belt around Guildford in order to protect Green Belt around Woking does not consider environmental limits or impact on the next generation in terms of weighing demand for homes for the young alongside the use of all possible last resort greenfield options by one generation. The National Planning Policy Framework requires that objectively assessed needs should be met unless: “any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted.” Notwithstanding that the Sustainability Appraisal should be proportionate, strategic and look at significant matters, the assessment appears deficient and biased in the spectrum of alternatives it considers to the point that it is questionable whether it meets the requirements. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation. GBC has proposed an OAN of 693 houses per annum in the GL Hearn Strategic Housing Market Assessment (SHMA) which is unsound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7182  Respondent: 11100193 / Michael Turner  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

For the reasons stated above, I object to ALL Green Belt sites allocated for development in the local plan object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses.” This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A25 Gosden Hill. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. Gosden Hill is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below). The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7184  Respondent: 11100193 / Michael Turner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A26 Blackwell Farm. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of green belt, and fulfils purposes 1, 3 and 5 very strongly. · Purpose 1 - “checking the unrestricted sprawl of large built-up areas”. There is huge pressure to develop on the western edge of Guildford; the University of Surrey has stated publicly that its key objective is to develop the whole of its landholdings, stretching west to Flexford Farm. This, combined with the indefensible boundary being proposed (a hedgerow rather than the existing belt of ancient woodland), will put more of the green belt and the Surrey Hills Area of Outstanding Natural Beauty (AONB) at risk of future development. · Purpose 3 “assists in safeguarding the countryside from encroachment” - the proposed movement of the green belt boundary on the west of Guildford to allow for development of the University in 2004 resulted in the encroachment on countryside and the loss of working farmland.
(including some Grade 2) at Manor Farm. The proposed future change in the boundary would result in further encroachment and the loss of farmland including further Grade 2. The proposed road development with access road from the A31 would also effectively cut off farm access to the south of the development area leading to further urban influence on this countryside. The University’s stated key objective is to develop land which includes Chalkpit and Wildfield farms leading to the risk of further boundary change and further encroachment in future years.

Purpose 5 - “assists in urban regeneration by encouraging the recycling of derelict and other urban land”
The Blackwell Farm development would result in harm to the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the setting to the AONB. (Blackwell Farm forms the views into and out of the Hogs Back ridge). The NPPF is clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. All development proposals within and adjacent to the AONB must conserve or enhance its special qualities. The NPPF also makes it clear that applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public’s interest. Guildford Borough Council has not shown that the proposed housing development or the extension of the Research Park, or the proposed link road from the A31 to Gill Avenue, is in the wider public interest. Indeed, the increased traffic through the already congested Egerton Road/Gill Avenue junction, which would result from the development, would impede emergency vehicles travelling to the Hospital and this would be very much against public interest. GBC’s Policy P1 states that, “The Surrey Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development. All proposals will be considered against whether they conserve and/or enhance the setting and views of the AONB”. I question how the proposal to carve a new two-lane carriageway through the AONB fits this policy, or meets para 115 of the NPPF? Finally, nearly the whole site has been identified as a “candidate area” for AONB status in the Landscape Evaluation Study commissioned by Compton, Worplesdon and Wanborough parish councils. Therefore, the entire site should be treated as though it is within the AONB during this local planning process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7185  Respondent: 11100193 / Michael Turner  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A35 Wisley. I object to the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. However, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision. There is in any case no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected. Policy A35 should be deleted from the plan for all the reasons the development was rejected by the Planning Committee, including:

- Green Belt location and absence of “exceptional circumstances”.
- Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.
- Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).
• Proximity to A3/M25 bottleneck and Ripley village and roundabouts.
• Absence of adequate traffic data.
• Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.
• Loss of high-quality agricultural land (55% of the site), in breach of national policy.
• Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.
• Presence of a Surrey County Council safeguarded waste site.
• Cost of infrastructure required to the detriment of alternative more favourable sites.
• Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.
• Impact on listed buildings.
• Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.
• Extreme housing density with tiny garden spaces.
• Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.
• Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).
• Failure to evaluate the cumulative impact of this and nearby development sites on the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7186  Respondent: 11100193 / Michael Turner  Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A42 Clockbarn Nursery. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. The site is part of the permanent Green Belt at Send and should remain undeveloped in order to preserve the amenity of the surrounding area. The site has very restricted access along Tannery Lane which is narrow and for most its length only capable of providing access for cars in one direction. Development of the site is not therefore sustainable or practical. Tannery Lane already provides access to a Business Park which generates a considerable amount of traffic at all times of the day including lorries. This narrow country lane cannot cope with any more traffic. Planning consent has already been granted, rather unwisely given the access problems, for 84 flats and a marina. Anymore development at this location would not be sustainable. The junction with Send Road has poor visibility and is dangerous for traffic entering and leaving Tannery Lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7187  Respondent: 11100193 / Michael Turner  Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A42 Clockbarn Nursery. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. The site is part of the permanent Green Belt at Send and should remain undeveloped in order to preserve the amenity of the surrounding area. The site has very restricted access along Tannery Lane which is narrow and for most its length only capable of providing access for cars in one direction. Development of the site is not therefore sustainable or practical. Tannery Lane already provides access to a Business Park which generates a considerable amount of traffic at all times of the day including lorries. This narrow country lane cannot cope with any more traffic. Planning consent has already been granted, rather unwisely given the access problems, for 84 flats and a marina. Anymore development at this location would not be sustainable. The junction with Send Road has poor visibility and is dangerous for traffic entering and leaving Tannery Lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to policy A43 Garlick’s Arch. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. There is a danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in Send, Ripley and Clandon will result in the character of these villages being lost and the countryside encroached. I object to the proposal to build 7,000 sq m of light industrial, general industrial or warehousing on the site at Garlick’s Arch. There is no need to place a Strategic Employment Site in this location when there is plenty of spare space available at Slyfield (40 ha).

The Employment Land Needs Assessment (ELNA) 2015 has been reduced by 80% since the ELNA 2013. There is no longer any need to place industrial development in the Green Belt when there are plenty of brownfield sites available. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads. Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces. Many of the affected villages, such as Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems. With some 5000 houses being proposed close to the village of Send and Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians. I object to the lack of proper infrastructure planning for sites (Policy I1) which requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways. Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or
freezes. Any further development without funding will place further stress upon existing health services. I object on the
grounds of the congestion that development will cause to the trunk roads, A3/M25 (Policy 12). There is no certainty that
either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period.
The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will
only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7188  Respondent: 11100193 / Michael Turner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a). The addition north facing ramps to the
A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3
to the north, but the addition will draw in a huge amount of ‘through’ traffic. The route from London/M25 to Woking
would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will
now go through Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot
be improved.I object to the proposed Infrastructure Schedule (Appendix C). The Infrastructure Schedule sets out the key
infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it
identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that
the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7189  Respondent: 11100193 / Michael Turner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A44 Send Hill There is no need for housing on this site because the local plan housing target is
incorrect and inflated and ignores constraints. The proposed development is not sustainable because of poor infrastructure.
Send Hill is a single track country road and too narrow to provide sufficient access to the site for travellers or accommodate
the potential new levels of traffic the proposed development would bring. The site is a high quality green belt amenity area
within beautiful surrounding countryside and would be spoilt by the development. A Wasteland Solutions environmental
report on Send Hill dated March 2004 gave evidence of past ponding of water in the excavated area. Further development
would disturb the water table and increase risk of flooding to surrounding properties. The site was used as a GBC registered landfill site and shown on the 1963-8 Ordnance Survey maps as “refuse and slag heap”. It is therefore unsuitable for such a development on health reasons. On the 1971 Ordnance Survey the site is shown as a “refuse tip” prior to when proper licensing/registration was required. The date of the landfill works predates the 1999 EU Landfill Directive regulations. I therefore believe that there is a danger that any disturbance would be health hazard due to the unknown materials. GBC has installed gas monitoring wells on site since July 2000. One well recording methane gas discharge and development of this site would be a health hazard.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/16123</th>
<th>Respondent: 11100193 / Michael Turner</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy D1 Making better places. I object to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas where Government policy requires development to preserve or enhance their character. The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design rather than result in better-designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy D3 Historic Environment. This policy clashes with the strongly pro-development agenda of the rest of the plan. The policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to “support development” that might “enhance” heritage assets leaves wide scope for abuse in the form of destructive commercialisation and financial leveraging of relevant sites. This policy is based on the false premise that Guildford’s heritage is inherently in decay. Any development close to historical assets which is harmful should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to Policy E7 Guildford Town Centre. I am of the opinion that policy E7 is ill-informed and there is insufficient evidential support to objectively assess the capacity of the existing town centre to accommodate appropriate new development and therefore fails the requirements of Section 161 of the NPPF to assess the real quantitative and qualitative floor space needs. There is no reliable evidence provided that the retail core of the Town Centre needs or can be expanded by 45,000 sq m of retail space at North Street because of lack of demand for retail units in the Town Centre particularly large units. This is due to falling demand for retail space in Guildford and town centres throughout the country evidenced by independent research and the reality of empty shops in many high streets (including Guildford) and the accelerating competition from internet shopping. The failure of the North Street scheme to be redeveloped over the last ten years is a testament to lack of demand which has been so poor that the original planning permission for a large retail scheme became time expired. The reality is that the town centre has enough retail floor space. If more is introduced it will result in the closure of existing shops particularly in locations which are less than 50% of peak Zone A or 100% positions. What Guildford needs is a new focus on speciality high quality comparison shopping supported by a revival of Guildford’s attractive heritage core and a new major visitor attraction supported by restaurants. Guildford needs to become the quality shopping destination for Surrey. The existing site in North Street should be replaced with a well-designed ground floor high quality speciality retail mall and frontage of no more than 40 shops extending to 7,000 sq m with the rear and upper floors providing an additional 500 to 600 homes. The proportion of the above proposed smaller scheme at North Street will be complementary to and not antagonistic to the Upper High Street, Tunsgate, the Debenhams site and the 100% Zone A positions of the Lower High Street. If the existing policy under E7 is adopted the North Street site will remain empty for another 10 year The findings of the Guildford Retail and Leisure Study 25 September 2015 are very pessimistic about retail trends.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to Policy P2 green belt. This policy states, “the general extent of the Green Belt has been retained.” This is completely false. The policy wording is weak in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. Policy P2 completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and it needs to be permanently protected. The boundaries of the Green Belt through Guildford Borough were defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations. It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. I object to the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages. I am disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages reflect the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development. I believe this policy is based on a flawed Green Belt and Countryside Study. To “inset” two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions. Send is a good example of villages that should not be removed from the Green Belt. Send provides an important Green Belt buffer between Woking and Guildford. The village and the countryside behind the A247 should all be protected.

I object to three particularly vulnerable areas of high quality amenity land being taken out of the Green Belt around Send which include:

- The land behind the schools including playing fields and woodland.
- The land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering.
- Land to the left of Cartbridge going up to the old depot on the Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to policy S1 as stated and the presumption in favour of sustainable development. The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Policy S1 ought to set a clear framework. No definition of “sustainable development” is given.

The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts. The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16120  Respondent: 11100193 / Michael Turner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy S2 the Borough Wide Strategy and the commitment to build 13,860 homes based on the Strategic Housing Market Assessment (SHMA) 2015 prepared by GL Hearn. I am surprised that GBC have adopted the OAN of 13,860 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”. This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. However it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing. The figure of 13,860 new homes is unsubstantiated. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA. Both the NPPF and National Planning Policy Guidance provide a clear policy direction that the overall housing target should be reduced by a variety of constraints to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors. The NPPF also makes clear that, once established, Green Belt boundaries should only be altered in “exceptional circumstances”, through the preparation or review of the Local Plan. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries. Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1802  Respondent: 11100193 / Michael Turner  Agent:
<table>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>Policy A42 Clockbarn Nursery, Tannery Lane The proposed allocation for 45 homes in the previous draft plan on green belt land was objected to &amp; I object to this revision which now proposes a 33% increase to 60 homes. Tannery Lane is unsuitable for the quantity of traffic which would be generated, as is the junction with the A247, and there are no exceptional circumstances to warrant development on the green belt.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Policy A43 Garlick's Arch, Send Marsh</td>
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<td>I object to the proposed allocation for 400 homes and 6 travelling show people plots. There are no exceptional circumstances to warrant development on the green belt. There is insufficient services infrastructure for housing and show people plots, nor any justification for concentrating 6 of the proposed 8 borough-wide show people plots within Send. The road network is insufficient for housing development on this scale.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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Policy A58 land at Burnt Common, London Rd I object to a new allocation of 7,000 sq m of industrial or warehousing which was deleted from the 2015 draft. I also object to the wording of the allocation: the 2016 "maximum" allocation of 7,000 sq m has now been changed to "minimum". There is a surplus of industrial premises in the borough and the requirement for further industrial/warehousing has not been proven. The road infrastructure is inadequate and there are no exceptional circumstances to warrant development on the green belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy 2 paragraph 4.3.15 green belt.

I object to the proposal to inset Send Business Park from the green belt. The business park fronts the River Wey navigation which is acknowledged as protected corridor. The business park is a historical accident arising from a former historic industrial use. Tannery Lane is too restricted for any increase in traffic and the business park should remain within the green belt to inhibit further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
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<th>Comment ID: PSLPA16/3003</th>
<th>Respondent: 11101345 / Katja Schilling-Bayley</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Once again the “revised” Local Plan circulated by Guildford Borough Council is based upon flawed arguments, inaccurate information and in many examples a complete disregard for rational and intelligent thought.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

| Comment ID: PSLPA16/3005 | Respondent: 11101345 / Katja Schilling-Bayley | Agent: |
I OBJECT to the Local Plan in its current state, especially the following points:

- Removing the Horsleys from the Green Belt
- Extending settlement boundaries of the Horsleys
- Overloading already stressed infrastructure
- Defining Station Parade in East Horsley as a “District Centre”
- Using unfounded and inflated future housing numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12500  Respondent: 11101345 / Katja Schilling-Bayley  Agent:

I strongly OBJECT to this policy on the grounds that is completely ignores the need for residential (rather than commercial) development within Guildford town centre and the use of brownfield sites before destroying the Green Belt.

This policy truly makes one wonder whether any member of the Policy drafting committee has recently visited Guildford town centre. A once vibrant and thriving market town, Guildford is now a sad, depressing shell of its former self, populated by empty shops and a growing number of cheap brands. There is falling demand for retail space in town centres throughout the country as internet shopping continues to grow (see independent research and CEBR studies). What Guildford needs is a new focus on speciality high quality shopping supported by a revival of the town’s heritage core, historic visitor attractions and a diverse selection of restaurants.

As an existing urban centre, it should furthermore receive a larger share of proposed new housing by making use of its brownfield sites. Paragraph 17 of the NPPF states that to “encourage the effective use of land by reusing land that has been previously developed (brownfield land)” is a core planning principle. Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy. How can this be overlooked time and again??

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly OBJECT to the proposal that sites “on the edge” of District Centres will be considered for retail developments.

This is clearly leaving the door wide open for the expansion of retail hubs – which will become necessary to “meet everyday shopping and service needs” of the proposed new housing estates in the countryside.

This is clearly a case of “horse before carriage”. Expanded retail hubs are being proposed in order to sneakily justify expanded house construction in the villages. Yet without proper consideration of the - already existent - traffic and infrastructure problems.

Why not support existing rural shops and services instead? These have far more character and will give the villages back their historic characters, rather than turning them into “High-Street-Wannabies”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12503  Respondent: 11101345 / Katja Schilling-Bayley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I categorically OBJECT to this policy.

As a start, the Green Belt does not belong to Guildford Borough Council and therefore is not theirs to carve up and dispose of as they choose. The Green Belt totals 89% of the borough and as such must be vigorously protected for existing and, above all, future generations.

Careful and considered development of certain Green Belt areas could be considered – but these must be proportionate to the size of existing developed areas. For example, how can anyone justify that urban Guildford receive less development than semi-rural Horsley? Guildford is in desperate need of regeneration! How can this be overlooked in favour of sacrificing untouched countryside? The revival and repopulation of central London is a clear example that building satellite settlements is an out-of-date approach to planning.

Furthermore, the “insetting” of 14 villages and “infilling” 12 villages from the Green Belt is a completely flawed plan when considering these villages’ proximity to metropolitan London. How can someone argue that these villages fail to contribute to the purposes of the Green Belt? Yet again this is a totally flawed manipulation of incorrect information.

I fervently hope that this time residents’ considerations will be taken into account more and will result in a less “fluffy” version of a Local Plan – one that will be based upon concrete evidence rather than hypothetical approximations and one that will preserve the existence of the Green Belt.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the changed Policy A35 Wisley

- The two new slip roads at A247 Clandon Road (Burnt Common) and associated traffic management will not in any way mitigate the impact on Ripley High Street since traffic will need to pass through Ripley to reach Wisley.
- My previous objections therefore still stand for this changed policy concerning the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers to try again. This is disgraceful!
- There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the changes to Policies A36 to A41 (East and West Horsley)

- The number of potential development sites has been reduced by MERELY TWO (A36 and A41, representing a total of 138 dwellings). This leaves four sites (A27-40) which still represent a total of 395 new dwellings.
- Marginal changes such as these would still leave 70% of all new development in the borough built on Green Belt sites. No “exceptional circumstances” or any other justification is advanced for this strange imbalance.
• The deletion of two Horsley sites fails to correct the issue of relative overdevelopment in East and West Horsley, which is both excessive in absolute terms and disproportionate in relation to the rest of the borough.
• The plan fails to mention most of the known sustainability issues and infrastructure constraints affecting the Horsley sites, including public transport, traffic, road safety, parking, schooling, medical facilities, sewage, flooding/surface drainage and shops. These were fully set out in responses to last year’s public consultation.
• The density of new housing on the four Horsley sites is inappropriate, being greater than anywhere in the locality at present. Collectively, the four Horsley sites breach NPPF paragraph 81’s encouragement of access to the Green Belt and its amenity and recreation value.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2021  Respondent: 11101345 / Katja Schilling-Bayley  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the changes in Policy E7 Guildford Town Centre

• I am of the opinion that policy E7 is still very ill-informed and there is insufficient evidential support to objectively assess the capacity of the existing town centre to accommodate appropriate new development
• I also object to the continued failure of this policy to provide much needed substantial residential development in the Town Centre which is still only a modest target of 1,300 homes. Only approximately 10% of the total planned for the Borough. There is still a blind over concentration on retail expansion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2020  Respondent: 11101345 / Katja Schilling-Bayley  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the changes to Policy P2

- Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital.
- It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.
- I object to the changed “insetting” of 15 villages (including Ripley) from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages.
- I am deeply upset that settlement boundaries are to be hugely extended in many villages (particularly at Send) and that infilling is also proposed outside the settlement boundaries of 11 further villages. This is completely unplanned and unmeasured development outside of the OAN.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4395  Respondent: 11101473 / Ewa Fuller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to express my absolute objection to the latest re-vamp of the Guildford Local Plan.

It is clear that on many levels, you have yet again refused to listen to residents and continue to promote a wholly inappropriate and unacceptable plan.

I have been resident in West Horsley for 21 years and moved here specifically because it was in the Green Belt. It is my understanding that for any authority to remove Green Belt status, “exceptional circumstances” must be demonstrated. This is not the case with the current plan as no “exceptional circumstances” have been given and the proposed extended boundaries appear to be aimed simply at increasing available land for future development.

There seems to be major doubt concerning the inflated and unrealistic number of new houses proposed by a Strategic Housing Market Assessment, calculations from which, are not in the plan and do not seem to be available to Guildford Borough Council either. The target housing number arrived at by the SHMA is further increased by Guildford Borough Council, to a figure that is almost 70% higher than that suggested by official national estimates for population growth in the borough.

385 new homes are being proposed in West Horsley alone between 2018 -2022, which is an increase of 35% on the current number of homes. This is greater than any other single area in the borough and imposes an unsupportable burden on drainage infrastructure, road network, public transport, parking facilities, medical services and schools.

Our 1 remaining Primary school is full and has been for years, the nearest secondary school (which is a half hour bus drive for my children) is also at full capacity, however, there seem to be no plans for creating further school places for children from the Horsleys.
Our roads are in an appalling state and cannot even cope with the current number of vehicles using them, let alone, potentially, an extra 770 cars if we allow 2 per household, which is not unusual nowadays. Every single household in my road has 2 or more cars.

Drainage in the village is an issue and The Street regularly floods during periods of prolonged rain. Apparently, Thames Water has advised Guildford Borough Council that the current drainage network will not be able to cope with the anticipated demand from the proposed new developments.

There seems to be a visible lack of any plans for new drains, roads, schools, Doctor’s surgeries etc, and this is before we even mention the new development of 2000 houses proposed on the former Wisley Airfield, despite the planning application being unanimously refused by the full planning committee this year.

Finally, the National Planning Policy Framework states that any new residential development must respect the character and density of housing in the area and must be limited in quantity by the availability of infrastructure and local facilities. Clearly, this advice is being flagrantly disregarded by Guildford Borough Council with the current proposed local plan for west Horsley.

This current draught of the local plan is unrealistic and unsupportable and does not warrant the time and resources being spent on it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4860  Respondent: 11101505 / Daphne White  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7017  Respondent: 11104033 / David Dutton  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Gosden Farm Hill development (A25) because the strategy for managing traffic to and from this site involves channelling road traffic via the A247 through West Clandon.

I am concerned that more weight should be given to the effect on the existing rural communities, including the local communities of West Clandon, Send and Ripley, with regard to:

1. the effect that increased motor traffic would have on these communities;
2. to the need that any development to existing rural communities should be proportionate to the size and nature of those existing rural communities and should preserve their rural character;
3. the need to maintain the Green Belt; and

West Clandon is a linear village stretching for approximately 3km or 2 miles from the current A3 Burnt Common southbound entrance slip-road, south along the A247 to the traffic lights at the junction with the A25/A246, just south of West Clandon church. West Clandon has a historic centre with a church, two pubs, a branch of the Royal British Legion, an infant school, an old people's home (Ashley Park), a recreation ground and Clandon Park (a historic National Trust property currently under reconstruction after being damaged by fire). West Clandon has a railway crossed by a hump-backed bridge and a railway station. The southern half of the village is in a conservation area. The village comprises approximately 500 homes.

The A247 through West Clandon, known as “The Street” or at the north end of the village “Clandon Road”, runs right the way through the village. In places it is narrow and winding with significant bends. There is a footpath only on one side and the road is so narrow that it is frequently mounted by lorries. There is a constant stream of broken wing-mirrors left behind as debris evidencing the narrowness of The Street at some sections. Within the last couple of years there has been at least one collision between a vehicle and a building (Summers Barn) at a narrow section. The A247 already has a disproportionate amount of traffic to cope with compared to neighbouring villages because it has a road crossing over (rather than under) the railway line.

Around 100 houses, businesses and amenities have an access directly onto The Street (or Clandon Road). Some of these have very limited visibility (lines of sight) of oncoming traffic in either direction, except through the use of mirrors. The approach road to West Clandon railway station and the Onslow Arms pub are two examples of entrances onto The Street with extremely limited visibility – in the case of the railway station because of the hump-backed bridge, and in the case of The Onslow Arms pub, because the pub building itself is situated on the road and obscures a clear view of traffic approaching from the north. Within the last two weeks there has been a road traffic accident outside The Onslow Arms with one of the vehicles ending up in the garden of Brownlow Cottage opposite the pub. Accidents and near-misses at the junction of Clandon station approach with The Street are extremely common and this is well-known as a dangerous junction with very limited visibility of traffic approaching from the north.

The danger of traffic in West Clandon not only affects vehicles but also pedestrians. The linear nature of the village, plus the fact that the road is only wide enough for a footpath on one side at various points, means that the frequency of passing vehicles can make it difficult for pedestrians to enter and exit some properties at busy times. The same limited visibility from some entrances of traffic on The Street that affects people leaving these properties by vehicle also affects pedestrians. This is particularly difficult for an elderly person or a child. If the volume of traffic increases, the situation will become worse.

The A247 splits the village of West Clandon in half. It divides the church on the west side of The Street from its car park on the east side of The Street. It has to be negotiated by elderly residents of the Ashley Park Care Home, children and parents dropping off or collecting from the Clandon Infant School, users of the two pubs on opposite sides of the road, the railway station, the Recreation Ground and The Royal British Legion.
If there is a higher volume of traffic (at whatever speed), it will be harder to find a gap in the traffic during busy times in order to safely cross The Street. A pedestrian crossing cannot be provided from every house or every business or amenity and there is insufficient room to allow footpaths to be built on both sides of The Street.

Users of several public footpaths crossing The Street, including one on a severe bend near the church, will be put at greater risk. The same is true for pedestrians crossing from the graveyard, Ashley Park old people's home or the church car park, all of which are on the east side of The Street, to the church side of the A247 which has the only pavement at that point.

The number of cyclists that use the A247 as a route to access The North Downs has increased massively following the well publicised use of cycle routes in this area during the Olympics and in national cycle events. The A247 is now a corridor for cyclists accessing the Downs from Woking and beyond. The winding and narrow nature of the A247 makes it difficult for other vehicles to overtake these cyclists. If the volume of traffic increases then this will only make this problem worse and lead to a higher risk of accidents as more vehicles try to overtake cyclists on narrow winding roads.

Many of the above concerns are specific to West Clandon because it is a linear village divided by the A247 which is narrow, winding and in places bordered by a footpath on only one side. Because it winds through the historic centre of West Clandon there is no possibility of the A247 being widened or of additional footpaths being provided alongside the road, or of improvements to visibility for entrances on to or off The Street. For all of these reasons I consider any significant increase in the volume of traffic on the A247 through West Clandon could have a seriously damaging impact on the quality of life of residents of West Clandon including the approximately 100 homes with entrances directly off The Street/Clandon Road, and on users of West Clandon's railway station, pubs, infant school, church, old people's home, Royal British Legion club, recreation ground and public footpaths.

I am concerned that the provision of 400 homes plus industrial, storage and distribution units at Garlick's Arch just to the north east of West Clandon, an additional entrance and exit to the A3 at Burnt Common, and 2000 homes at Godsen Hill Farm, will produce a much greater volume of traffic on the A247 through West Clandon, particularly at busy times. I OBJECT because I do not believe there has been a proper assessment of the likely impact of these three proposals on the volume of traffic though West Clandon and the effect that this will have on that community, or that any assessment has been properly taken into account. I OBJECT because a key consideration should be the effect on existing neighbouring communities, taking into account the specific circumstances of those communities. A key consideration for Policy 43a (New A3 slip-roads at Send-Marsh/Burnt Common), Policy 43 (Garlick's Arch) and Policy A25 (Godsen Hill Farm) should be the effect of the increased traffic that these policies and the Plan as a whole will have on the community of West Clandon and neighbouring communities of Ripley and Send.

Additionally the scale of the proposed developments in the vicinity of West Clandon are disproportionate to the size of the existing rural community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the Garlick’s Arch site (A43) because it will further increase traffic on the A247. The site should not be promoted as a distribution hub.

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7015  Respondent: 11104033 / David Dutton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In particular I OBJECT to the proposal to create a 4-way junction with the A3 at Burnt Common/Send Marsh (site A43a). This will substantially increase traffic on the A247 through West Clandon. This is a narrow winding road with many bends affecting lines of sight with regard to vehicles emerging from entrances onto the A247 in West Clandon. Two examples are the junction between the 247 and Clandon station approach road, and the exit from the Onslow Arms, both of which are the sites of regular accidents and near-misses. The increased traffic will also impact pedestrians in West Clandon severely as there is only a footpath on one side of the road, pedestrians find it difficult to cross particularly where there is limited visibility, and lorries regularly mount the pavement to pass. The road is not capable of significant improvement because it is constrained by buildings.

I OBJECT to Policy A43a for the following reasons...

I OBJECT most strongly to the inclusion of the land for new on/off ramps at Burnt Common (A43a). The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount.
the pavement. There is also very limited visibility from some houses, businesses and amenities for vehicles turning onto The Street or for pedestrians trying to cross The Street (e.g. Clandon railway station approach, Onslow Arms car park, Bull's Head car park, West Clandon church car park).

The A247 through West Clandon is a narrow winding road with many bends affecting lines of sight with regard to vehicles emerging from entrances onto the A247 in West Clandon. Two examples are the junction between the 247 and Clandon station approach road, and the exit from the Onslow Arms, both of which are the sites of regular accidents and near-misses. Vision at the junction with the station approach is obscured by the humped backed bridge. Vision at the Onslow Arms is obscured by the pub building being on the edge of the road. The increased traffic will also impact pedestrians in West Clandon severely as there is only a footpath on one side of the road, pedestrians find it difficult to cross particularly where there is limited visibility. This is a particular problem for elderly people and children. The road is not capable of significant improvement because it is constrained by buildings.

Note the following accident data:
2010 –2014 from Crashmap data
- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents
2015
- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.
2016
- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road
- July 2016 Collision outside Onslow Arms resulting in one vehicle ending up in garden of cottage opposite

Within the last two weeks there has been a road traffic accident outside The Onslow Arms with one of the vehicles ending up in the garden of Brownlow Cottage opposite the pub. On another occasion the gate post of the property next to the Onslow Arms has been damaged. Accidents and near-misses at the junction of Clandon station approach with The Street are extremely common and this is well-known as a dangerous junction with very limited visibility of traffic approaching from the north.

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

There is a constant stream of broken wing-mirrors left behind as debris evidencing the narrowness of the A247 at some sections. Within the last couple of years there has been at least one collision between a vehicle and a building (Summers Barn) at a narrow section. The A247 already has a disproportionate amount of traffic to cope with compared to neighbouring villages because it has a road crossing over (rather than under) the railway line.

Around 100 houses, businesses and amenities have an access directly onto The Street (or Clandon Road). Some of these have very limited visibility (lines of sight), except through the use of mirrors.

The danger of traffic in West Clandon not only affects vehicles but also pedestrians. The linear nature of the village, plus the fact that the road is only wide enough for a footpath on one side at various points, means that the frequency of passing vehicles can make it difficult for pedestrians to enter and exit some properties at busy times. This can be particularly difficult for an elderly person or a child. If the volume of traffic increases, the situation will become worse.

The A247 splits the village of West Clandon in half. It divides the church on the west side of The Street from its car park on the east side of The Street. It has to be negotiated by elderly residents of the Ashley Park Care Home, children and parents dropping off or collecting from the Clandon Infant School, users of the two pubs on opposite sides of the road, the railway station, the Recreation Ground and The Royal British Legion.

If there is a higher volume of traffic (at whatever speed), it will be harder to find a gap in the traffic during busy times in order to safely cross The Street. A pedestrian crossing cannot be provided from every house or every business or amenity and there is insufficient room to allow footpaths to be built on both sides of The Street.
The number of cyclists that use the A247 as a route to access The North Downs has increased massively following the well publicised use of cycle routes in this area during the Olympics and in national cycle events. The A247 is now a corridor for cyclists accessing the Downs from Woking and beyond. The winding and narrow nature of the A247 makes it difficult for other vehicles to overtake these cyclists. If the volume of traffic increases then this will only make this problem worse and lead to a higher risk of accidents as more vehicles try to overtake cyclists on narrow winding roads. Many of the above concerns are specific to West Clandon because it is a linear village divided by the A247 which is narrow, winding and in places bordered by a footpath on only one side. Because it winds through the historic centre of West Clandon there is no possibility of the A247 being widened or of additional footpaths being provided alongside the road, or of improvements to visibility for entrances on to or off The Street. For all of these reasons I consider any significant increase in the volume of traffic on the A247 through West Clandon could have a seriously damaging impact on the quality of life of residents of West Clandon including the approximately 100 homes with entrances directly off The Street/Clandon Road, and on users of West Clandon's railway station, pubs, infant school, church, old people's home, Royal British Legion club, recreation ground and public footpaths.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15534  Respondent: 11104033 / David Dutton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1).

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads. Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems. With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon, The Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements. The bends and narrow width of the road in West Clandon make the road difficult to access from some of the 100 or so houses, businesses and amenities with entrances onto the road (e.g. Onslow Arms pub, Clandon railway station). The same difficulty is experienced by pedestrians and the fact that there is only a footpath on one side of the road makes it impossible to improve safety for pedestrians crossing the road in many places. These problems will become worse with increased traffic.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15533  Respondent: 11104033 / David Dutton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2).

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15532  Respondent: 11104033 / David Dutton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2).

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The road infrastructure in West Clandon has the added disadvantage that West Clandon is a linear village and the road through it is narrow in places with many bends and poor visibility for access for pedestrians and vehicles alike. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area.
which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Gosden Hill development of 1700 houses. Reference to a potential link road from the development to the A247. The clear implication is for an access from the development to the A247 with enormous traffic implications for the A247.
2. South bound off- and on- slip roads to service the development and replace the existing off- slip road to Burpham. The only North bound access to the A3 will be via the existing slip road off Clay Lane. (See later, Burnt Common).
3. A 4-entry form secondary school, a primary school, a retail centre and a park and ride for up to 700 cars.
4. When developed, the new employment site at the north side of Gosden Hill Farm (site allocation A25) will be treated as an Office and Research & Development Strategic Employment Site (7000sq.m). This could mean several hundred employees.
5. The development of this site will cause massive congestion in surrounding roads. It will generate many thousands of vehicle movements onto the A3 which is already at a crawl every day during peak periods.
6. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. The proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress.
8. The A247 through West Clandon is not suited to cope with additional traffic for reasons including: (i) although notionally an A-road the A247 is narrow and winding in parts and is most unsuited to carrying additional traffic, (ii) the A247 has a single non-continuous footpath in several sections, (iii) a care home, a church car park and a pub, as well as very many houses, are located on the opposite side of the road to the only footpath, making pedestrian access difficult for people moving about the village on foot, especially for elderly and disabled people; (iv) the railway station and other commercial and residential properties have poor sight lines for access onto the A247 and difficulties in accessing the A247 from these properties will be exacerbated by increased traffic volume.
(and fewer “gaps” between cars); (v) the A247 is popular with cyclists and because of its narrow and winding nature the potential for accidents that additional traffic will cause is clear.

9. The A247 may be an A-road on the map but in reality it is a residential road with numerous bends, narrow sections and side-entrances. The road through West Clandon already has numerous accident black spots, such as: (I) the exit from Clandon station which has extremely poor sight lines due to a humped back bridge where numerous accidents have occurred; (ii) the exit from the Onslow Arms pub which is almost blind due to the pub building being adjacent the road - a vehicle has recently ended up in the garden of the cottage opposite; (iii) the narrow section outside “Summers” which is regularly littered with the wing mirrors of cars which have made contact, as well as being a dangerous area for pedestrians due to vehicles mounting the pavement to try to pass; (iv) the winding section outside Clandon Regis and near the primary school which regularly suffers from demolition of gate posts and fences as vehicles leave the road; (v) the bend near West Clandon church which has seen damage caused to the flint wall in recent years.

10. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too many.

11. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

12. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of Green Belt.

13. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity.

14. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

15. The development of this site cannot be sustainable and will cause massive congestion on surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3. The A3 is at a crawl every day during peak periods, and often at weekends as well. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.

16. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress.

17. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

18. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4159  Respondent: 11104033 / David Dutton  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
• **The Wisley development** of a new village / town with at least 2000 houses, 4-entry form secondary school and employment land. The development does not meet the NPPF requirement, namely that developments that generate significant movement will be located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. The provision of slip roads at the A3/A247 junction to relieve the impact of this development on Ripley will have potentially severe effects on the A247.

• My objections to increased traffic on the A247 through West Clandon are outlined more fully elsewhere but include: (i) although notionally an A-road the A247 is narrow and winding in parts and is most unsuited to carrying additional traffic, (ii) the A247 has a single non-continuous footpath in several sections, (iii) a care home, a church car park and a pub, as well as very many houses, are located on the opposite side of the road to the only footpath, making pedestrian access difficult for people moving about the village on foot, especially for elderly and disabled people; (iv) the railway station and other commercial and residential properties have poor sight lines for access onto the A247 and difficulties in accessing the A247 from these properties will be exacerbated by increased traffic volume (and fewer “gaps” between cars); (v) the A247 is popular with cyclists and because of its narrow and winding nature the potential for accidents that additional traffic will cause is clear.

• The A247 may be an A-road on the map but in reality it is a residential road with numerous bends, narrow sections and side-entrances. The road through West Clandon already has numerous accident black spots, such as: (I) the exit from Clandon station which has extremely poor sight lines due to a humped back bridge where numerous accidents have occurred; (ii) the exit from the Onslow Arms pub which is almost blind due to the pub building being adjacent the road - a vehicle has recently ended up in the garden of the cottage opposite; (iii) the narrow section outside “Summers” which is regularly littered with the wing mirrors of cars which have made contact, as well as being a dangerous area for pedestrians due to vehicles mounting the pavement to try to pass; (iv) the winding section outside Clandon Regis and near the primary school which regularly suffers from demolition of gate posts and fences as vehicles leave the road; (v) the bend near West Clandon church which has seen damage caused to the flint wall in recent years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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### Comment ID: pslp172/4156  
**Respondent:** 11104033 / David Dutton  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

Policy A43a BURNT COMMON SLIP ROADS – My Objections

50) Provision of a northbound on-slip road and a southbound off-slip road to the A3 to join the A247. These are stated to be required to relieve Ripley from the effects of the development of Wisley. It is not clear how this would work unless traffic from Wisley wishing to go south either goes up to the A3/M25 roundabout and comes back down the A3 or (as is claimed by the promoters of the Wisley development), direct access to the A3 southbound is provided at Wisley/Ockham. In either case, slip roads at the A247 seem unnecessary. It is more likely that these slip roads are intended to provide access to the Garlick’s Arch and Burnt Common developments. The slip roads will have the effect of creating an all-ways junction with the A3 at Burnt Common making it a centre for future development and a traffic magnet with clear implications for the A247.

51) If a 4-way junction for the A3 is deemed necessary, the logical place for it would be somewhere else, where it could enable an additional bridge to be created over the Guildford to Waterloo railway line to relieve the narrow A247 and its
hump backed bridge from carrying all the north-south heavy traffic which cannot, or chooses not to, pass under the other existing railway bridges.

52) My objections to increased traffic on the A247 through West Clandon are outlined more fully elsewhere but include: (i) although notionally an A-road the A247 is narrow and winding in parts and is most unsuited to carrying additional traffic, (ii) the A247 has a single non-continuous footpath in several sections, (iii) a care home, a church car park and a pub, as well as very many houses, are located on the opposite side of the road to the only footpath, making pedestrian access difficult for people moving about the village on foot, especially for elderly and disabled people; (iv) the railway station and other commercial and residential properties have poor sight lines for access onto the A247 and difficulties in accessing the A247 from these properties will be exacerbated by increased traffic volume (and fewer “gaps” between cars); (v) the A247 is popular with cyclists and because of its narrow and winding nature the potential for accidents that additional traffic will cause is clear.

53) The A247 may be an A-road on the map but in reality it is a residential road with numerous bends, narrow sections and side-entrances. The road through West Clandon already has numerous accident black spots, such as: (i) the exit from Clandon station which has extremely poor sight lines due to a humped back bridge where numerous accidents have occurred; (ii) the exit from the Onslow Arms pub which is almost blind due to the pub building being adjacent the road - a vehicle has recently ended up in the garden of the cottage opposite; (iii) the narrow section outside “Summers” which is regularly littered with the wing mirrors of cars which have made contact, as well as being a dangerous area for pedestrians due to vehicles mounting the pavement to try to pass; (iv) the winding section outside Clandon Regis and near the primary school which regularly suffers from demolition of gate posts and fences as vehicles leave the road; (v) the bend near West Clandon church which has seen damage caused to the flint wall in recent years.

54) The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion, difficulty for people in cars and on foot wishing to move about the village of West Clandon and greater pollution. Residents and the environment will suffer as a result.

55) I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day.

56) The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

57) The proposed developments will make it even more difficult for pedestrians to move around West Clandon village crossing from one side of the road to the other, bearing in mind that many properties can only access a footpath by crossing the A247.

58) The proposed plans will make it more difficult for vehicles to exit on to the A247 from the numerous entrances along the road, particularly in the narrow and winding section of the A247 between Clandon railway station and the A247/A25 crossroads. Many public and private properties on this section of the road have poor sight lines, including the Onslow Arms, West Clandon Church car park, Ashley Park care home, Clandon railway station.

59) Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village of West Clandon on the way to the Surrey Hills for the Olympic and the Prudential Ride London route. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4157  Respondent: 11104033 / David Dutton  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- **Burnt Common** strategic industrial employment site for light industry, storage and distribution activities. It is to be designated an Industrial Strategic Employment Site which means that it is a preferred site for industrial development including waste management facilities. The site is 9ha which it is stated allows for considerable future expansion. This will generate large amounts of traffic including heavy vehicles on the A247.

- The A247 through West Clandon is not suited to cope with additional traffic for reasons including: (i) although notionally an A-road the A247 is narrow and winding in parts and is most unsuited to carrying additional traffic, (ii) the A247 has a single non-continuous footpath in several sections, (iii) a care home, a church car park and a pub, as well as very many houses, are located on the opposite side of the road to the only footpath, making pedestrian access difficult for people moving about the village on foot, especially for elderly and disabled people; (iv) the railway station and other commercial and residential properties have poor sight lines for access onto the A247 and difficulties in accessing the A247 from these properties will be exacerbated by increased traffic volume (and fewer “gaps” between cars); (v) the A247 is popular with cyclists and because of its narrow and winding nature the potential for accidents that additional traffic will cause is clear.

- The A247 may be an A-road on the map but in reality it is a residential road with numerous bends, narrow sections and side-entrances. The road through West Clandon already has numerous accident black spots, such as: (I) the exit from Clandon station which has extremely poor sight lines due to a humped back bridge where numerous accidents have occurred; (ii) the exit from the Onslow Arms pub which is almost blind due to the pub building being adjacent the road - a vehicle has recently ended up in the garden of the cottage opposite; (iii) the narrow section outside “Summers” which is regularly littered with the wing mirrors of cars which have made contact, as well as being a dangerous area for pedestrians due to vehicles mounting the pavement to try to pass; (iv) the winding section outside Clandon Regis and near the primary school which regularly suffers from demolition of gate posts and fences as vehicles leave the road; (v) the bend near West Clandon church which has seen damage caused to the flint wall in recent years.

- I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site.

- This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.

- The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

- There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

- There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over-allocation of 9.26 hectares at Send in the Green Belt.

- The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607 sq.m. of B use class floorspace to come forward. This figure comprises a net loss of 4,750 sq.m. of B1a use class floorspace and a net gain of 38,357 sq.m. in B1c, B2 or B8 use class space.”

- 38,357 sq. m. of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. If you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq. m. approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
• The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357 sq.m.
• The impact on small surrounding roads will create traffic gridlock.
• It will join up existing villages and defeat the purpose of the Green Belt.
• The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
• The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
• The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Residents are being asked to accept very large amounts of development with little or no detail being provided on measures which would relieve existing congestion and limit future
2. Much is made of the need for new infrastructure to support developments and for this to be in place as needed (listed in Appx. C to the Plan). Even if this happens the Plan admits …”we forecast that there will also be an absolute increase in overall traffic volumes”, This will be most acutely felt at junctions but these effects have apparently not been analysed so that we don’t know the location or impact.
3. We can be sure however that the cumulative effects of the developments in the north east of Guildford will have a devastating impact on the A247 through the village of West Clandon (and of course on Send). It is hard to see how any of the infrastructure proposals in the Plan (Appx. C) will do anything to mitigate this impact. GBC has little or no control over the plans of Surrey County Council as the local highways authority and it is freely admitted by SCC that they have little money available.
4. The Plan now calls for nearly all infrastructure to be funded by developers (see C). I question how realistic it is to expect developers not only to pay for all the infrastructure but also to have it in place in a timely fashion. The Plan says that planning permission will be refused if timely provision of infrastructure cannot be secured. Such refusals will almost certainly be challenged in the courts. Developers’ business models are based on building and selling houses to create the cash required to provide infrastructure. People will be living on the sites well before infrastructure is complete, even assuming there are funds to provide it.
5. If development were to be refused the land would still have been removed from the Green Belt and its future rendered uncertain.
6. All of these developments will draw very large amounts of additional traffic to the A247 through the village. It would be naïve to think that the employment sites and schools will serve only the developments themselves. Apart from the normal movements of residents to and from the new sites there will be considerable additional traffic on the A247 generated by:
- children from elsewhere being delivered to Gosden Hill schools and collected
- the employees of the offices and industrial sites getting to work and returning home
- the vehicle movements generated by distribution and storage activities
- traffic from Wisley wishing to travel south and returning
- traffic from Gosden Hill wishing to travel south and returning
- traffic from Slyfield wishing to travel south and returning
- private and commercial traffic originating in the south and accessing Gosden Hill, Burnt Common or the A3 and returning (including traffic from Dunsfold)
- SCC’s business plan for Newlands Corner

I would like to point out that although the A247 is classified as an A road, it has none of the characteristics because it:
- is less than 2 vehicles wide in places. Larger vehicles routinely mount the only pavement.
- does not have continuous footpaths
- has a footpath only on one side of the road in long sections, including sections with pub, care home and church car park
- has several sharp bends
- has a hump-backed bridge over the railway, with poor sight lines
- has other entrances with poor sight lines (eg Onslow Arms, church car park)
- has a dangerous junction to access the station
- has a dangerous and unlit junction with the southbound A3 on-slip road
- has a primary school accessed by narrow pavements
- is largely unlit
- is already very congested at times, more so when delays on the A3 are severe

The A247 may be an A-road on the map but in reality it is a residential road with numerous bends, narrow sections and side-entrances. The road through West Clandon already has numerous accident black spots, such as: (i) the exit from Clandon station which has extremely poor sight lines due to a humped back bridge where numerous accidents have occurred; (ii) the exit from the Onslow Arms pub which is almost blind due to the pub building being adjacent the road - a vehicle has recently ended up in the garden of the cottage opposite; (iii) the narrow section outside “Summers” which is regularly littered with the wing mirrors of cars which have made contact, as well as being a dangerous area for pedestrians due to vehicles mounting the pavement to try to pass; (iv) the winding section outside Clandon Regis and near the primary school which regularly suffers from demolition of gate posts and fences as vehicles leave the road; (v) the bend near West Clandon church which has seen damage caused to the flint wall in recent years.

In summary, the A247 is quite unsuited to coping with additional traffic and it is very clear that the developments proposed in the 2017 Local Plan will increase the amount of traffic on this road over and above that in the 2016 draft to which residents strongly objected. There is nothing in the Infrastructure Schedule which addresses this issue. Indeed several of the infrastructure proposals will themselves lead to significant increases in traffic on the A247.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• Some 295 houses in various smaller developments in West Horsley, 100 in Send and 15 in Ripley. These will
generate traffic on the A247 to access the A3.
• My objections to increased traffic on the A247 through West Clandon are outlined more fully elsewhere but
include: (i) although notionally an A-road the A247 is narrow and winding in parts and is most unsuited to
carrying additional traffic, (ii) the A247 has a single non-continuous footpath in several sections, (iii) a care
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(iv) the winding section outside Clandon Regis and near the primary school which regularly suffers from
demolition of gate posts and fences as vehicles leave the road; (v) the bend near West Clandon church which has
seen damage caused to the flint wall in recent years.

All of these developments will draw additional traffic to the A247 through the village. It would be naïve to think that the
employment sites and schools will serve only the developments themselves. Apart from the normal movements of
residents to and from the new sites there will be considerable additional traffic on the A247 generated by:

- children from elsewhere being delivered to schools and collected
- the employees of the offices and industrial sites getting to work and returning home
- the vehicle movements generated by distribution and storage activities
- traffic from Wisley wishing to travel south and returning
- traffic from Gosden Hill wishing to travel south and returning
- traffic from Slyfield wishing to travel south and returning
- private and commercial traffic originating in the south and accessing Gosden Hill, Burnt Common or the A3 and returning
(including traffic from Dunsfold)

The A247 although an A road:

- is less than 2 vehicle wide in places. Larger vehicles routinely mount the (only) pavement to pass one another in the
narrow sections.
- does not have continuous footpaths
- has a footpath only on one side of the road in long sections, including sections with pub, care home and church car park
- has several sharp bends
- has a hump-backed bridge with poor sight lines
- has other entrances with poor sight lines (e.g., Onslow Arms, church car park)
- has a very difficult junction to access the station
- is largely unlit
- has a primary school
- is already very congested at times, more so when delays on the A3 are severe, which is common in the evening rush hours (4pm to 6:30pm) and summer weekends
- cuts through the Conservation Area of West Clandon within which 19 listed buildings are located with road frontage. A further 9 listed buildings are located on the A247 in West Clandon north of the Conservation Area.

The A247 is in reality a residential road with numerous bends, narrow sections and side-entrances. The road through West Clandon already has numerous accident black spots, such as: (I) the exit from Clandon station which has extremely poor sight lines due to a humped back bridge where numerous accidents have occurred; (ii) the exit from the Onslow Arms pub which is almost blind due to the pub building being adjacent the road - a vehicle has recently ended up in the garden of the cottage opposite; (iii) the narrow section outside “Summers” which is regularly littered with the wing mirrors of cars which have made contact, as well as being a dangerous area for pedestrians due to vehicles mounting the pavement to try to pass; (iv) the winding section outside Clandon Regis and near the primary school which regularly suffers from demolition of gate posts and fences as vehicles leave the road; (v) the bend near West Clandon church which has seen damage caused to the flint wall in recent years.

Changes to the Plan have done nothing to alleviate the problems (particularly of traffic and congestion) raised in residents’ previous responses. Indeed it is now clear that the problems will be made much worse. There do not appear to be any changes which would be of benefit to the Clandons and indeed the cumulative effect of what is in the Plan and some external factors not in the Plan will have a much worse impact on the A247 through West Clandon and Send than the 2016 draft. Note that the A247 is the only road over, i.e. without a height restriction, the Guildford to Waterloo railway, north east of Guildford, which doesn’t involve travelling through the town centre and is already busy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
The Local Plan is not sound.

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

1. The changes in this latest version of the Guildford Local Plan show little or no willingness on the part of Guildford Borough Council (GBC) to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and will bring increasing traffic congestion, pressure on other infrastructure, noise and pollution and a reduction in the quality of life of residents.

2. The Plan does not consider the implications of Surrey County Council’s (SCC) business plan for Newlands Corner to attract 100,000 more visitors a year. A significant proportion of these can be expected to use the already over-burdened A247 through West Clandon.

3. The Plan does not consider the Waverley Borough Council’s approval for the development of 1,800 homes at Dunsfold. This has the potential to feed traffic, which is trying to avoid congestion around Guildford, onto the over-burdened A247 to access the A3.

4. Changes to the Plan have done nothing to alleviate the problems (particularly of traffic and congestion) raised in residents’ previous responses. Indeed it is now clear that the problems will be made much worse. There do not appear to be any changes which would be of benefit to the Clandons and indeed the cumulative effect of what is in the Plan and some external factors not in the Plan will have a much worse impact on the A247 through West Clandon and Send than the 2016 draft. Note that the A247 is the only road over, i.e. without a height restriction, the Guildford to Waterloo railway, north east of Guildford, which doesn’t involve travelling through the town centre and for this reason it is already busy.

5. The A247 may be an A-road on the map but in reality it is a residential road with numerous bends, narrow sections and side-entrances. The changes to the Plan have done nothing to alleviate, and the cumulative effects have likely increased, traffic on the A247. The road through West Clandon already has numerous accident black spots, such as: (I) the exit from Clandon station which has extremely poor sight lines due to a humped back bridge where numerous accidents have occurred; (ii) the exit from the Onslow Arms pub which is almost blind due to the pub building being adjacent the road - a vehicle has recently ended up in the garden of the cottage opposite; (iii) the narrow section outside ‘Summers’ which is regularly littered with the wing mirrors of cars which have made contact, as well as being a dangerous area for pedestrians due to vehicles mounting the pavement to try to pass; (iv) the winding section outside Clandon Regis and near the primary school which regularly suffers from demolision of gate posts and fences as vehicles leave the road; (v) the bend near West Clandon church which has seen damage caused to the flint wall in recent years.

6. Difficulties will be caused to residents and visitors to West Clandon and its businesses as they seek to turn on to the A247 from the numerous entrances along the road. If traffic on the A247 was to increase substantially, which seems to be the intention behind the Plan, then this has the potential to create serious difficulties for people accessing the A247 from these side-entrances, whether in a vehicle or on foot. Between Clandon railway station and the crossroads at the A247/A25 junction there are many public and private properties with poor sight lines, including the Onslow Arms, West Clandon Church car park, Ashley Park care home, Clandon railway station (poor sight lines due to humped back bridge, buildings on the edge of the road and entrances being close to bends). This is a problem arising from volume of traffic and insufficient gaps to allow safe egress onto the A247.

7. The Plan does not address the difficulties of pedestrians either walking on narrow parts of the A247 where lorries habitually mount the pavement, or for pedestrians wishing to cross the A247 in the village of West Clandon. Elderly and disabled residents would become increasingly cut-off and isolated by increasing traffic. There would be increased difficulties for pedestrians accessing the Onslow Arms pub, Ashley Park care home, West Clandon Church car park and Clandon railway station (when accessed from the south) – all of which are at parts of the A247 with a pavement only on the opposite side of the road. To access these places on foot (the railway station from the south) it is necessary to cross the A247. The village of West Clandon does not and cannot have a footpath on both sides of the street in all sections. There are bends, buildings and a humped back bridge which create poor sight lines in several areas. For these reasons, the increased problems for pedestrians cannot be addressed by pedestrian crossings, which would in any case slow down traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Comment ID:** pslp17q/508  **Respondent:** 11104033 / David Dutton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise, air pollution and danger to residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/3324  **Respondent:** 11104385 / Brian O'Gilvie  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I strongly object to the proposed plans.

There is no exceptional circumstance that has been demonstrated to require Horsley to be removed from the green belt.

Extension of the boundary area of horsley is being attempted with no sound reason for this action.

The local infrastructure is overstretched and the enormity of the proposed developments are infeasible. Projecting a potential future of poorer and few resources for those living in the area.

**Attached documents:**

Page 1461 of 2855
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/3032  **Respondent:** 11107105 / Michelle Manester  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Secondly, I was amazed to discover that 45 houses are being proposed at Clockbarn Nursery in Tannery Lane and object to this build. Tannery Lane is so narrow and is predominantly a one car lane that will not allow for, and support increased traffic flow. Access is difficult enough as it is and hazardous at the Send junction!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/3033  **Respondent:** 11107105 / Michelle Manester  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the building of 400 houses and 7000 sq metres of industrial space at Garlick's Arch opposite Send Marsh Road. I feel it would impact on nature in the woodland. Again the road infrastructure and increased volume of traffic would not be acceptable and the impact on local services, which are struggling to cope as it is, would be unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/3034  **Respondent:** 11107105 / Michelle Manester  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
Lastly I object to a new interchange with the A3 at Burnt Common. The significant amount of increased traffic would be detrimental to Send. Send Road is already under strain from the volume of traffic and is often gridlocked. It doesn't cope well as it is! Noise and pollution levels would further increase and would have a negative impact on the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3035  Respondent: 11107105 / Michelle Manester  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Being a resident of Send Hill, I object to the proposal of building 40 houses and 2 traveller pitches at the end of my road. First and foremost the one car, single lane country lane at the end of my road is totally inappropriate and insufficient and does not provide sufficient access. I use the road daily at all times of the day and am 9 times out of ten forever reversing back up the road and squashing my car into bushes to allow a car to pass. The volume of traffic is at peak as it is, as much traffic comes off the A3 Slip Road down Send Hill. The increased flow of traffic would also have an adverse impact on street parking. Send Hill is already congested enough at school run times and is hard enough trying to get through the road both ends! The proposed site also contains unsafe landfill waste and it would impact significantly on the nature reverse. Not to mention the impact on local services - you can't even get a same day appointment as it is at the Doctor's surgery!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6549  Respondent: 11107105 / Michelle Manester  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
As a resident of Send Hill having lived here for 13 years, I feel the need to write to you about the proposed development currently being considered in Send.

First and foremost I was shocked, and object to Send Village being removed from the Green Belt, I was under the impression that this was always intended to be permanent and do not see any justification in removing it. Send is of significant importance as it acts as a conduit between Woking and Guildford. I feel totally let down upon hearing this as local councilors and the government had promised to protect our Green Belt, and this will clearly open the floodgate for developers to build in the area to saturation point if it goes ahead putting pressure on infrastructure, services, loss of nature etc

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/3718  **Respondent:** 11107265 / Carmen O'Connor  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I write with my comments and objections to Guildford Borough Council’s Local Plan and request that the Planning Inspector reads this email and is shown these comments so they are taken into account during the decision process. I also request that I receive confirmation reply that this email has been received and read by those with the authority and responsibility to do so.

I also request that these comments are not merely read thoroughly, but also listened to, heard and taken into account as with all the objections from other residents who have taken the time to write to you as you have requested them to do. Finally, that answers are respectfully given to the questions posed below.

**I object to Send Village being removed from the Green Belt**

- As I understand it, the Green Belt was intended to be permanent and required by the National Planning Policy Framework whereby no special circumstances to justify abandoning it could exist. I have been informed that historically local councillors and central government gave clear election promise to protect the Green Belt, so to change this clearly reneges on those promises. Where is the integrity in that? How do you imagine this builds honest partnership with the people who elect you from these communities and trust you to do good for this country?

**I object to the building of 45 houses at Clockbarn Nursery**

- There is clearly inadequate access for such potential traffic volumes. Tannery Lane is a country lane – the clue is in the name, it’s a lane – and it is absurd to think this road, plus access and exit can cope with such an influx of traffic both during the construction phase and after completion, especially when planning permission has previously been given for 64 apartments at the Tannery and for building the Marina.
- Access onto Send Road from any access point is already hazardous too and this will only exacerbate the situation further.
- Send Road is already too overwhelmed with traffic as a busy cut through from Woking to the A3/Guildford/M25 and reverse – it cannot cope in its current state, so why overload it in this way?
I object to the building of 400 houses and 7000 sq metres of industrial space at Garlick’s Arch

• I have been advised that this site is subject to flooding so it does not seem an appropriate site itself, nor for the immediate surrounding area
• Also this site is deemed to be of ancient woodland. Our historical woodland is part of the rich history of this great country – I absolutely object to our history and living breathing nature being torn down and destroyed for the sake of more human greed and consumption. Surely there is space at Slyfield for further industrial expansion in an appropriate environment, where it would not impact negatively on ancient woodland and village life?
• This location is also opposite Send Marsh Road, which would likely become a cut through for those heading to Woking on the A247. Already this road is full of pot holes and unsuitable for increases in traffic volume which would be inevitable. The infrastructure is not in place and I absolutely object to this site as part of the Local Plan.

I object to the new interchange with the A3 at Burnt Common

• Send would have to take the traffic from the proposed 2000 new houses at Wisley Airfield, 2000 houses at Gosden Hill, Burpham and 1850 at Blackwell Farm. How on earth does Guildford Borough Council think Send can take this? It is not feasible. As previously stated, Send Road is already too overwhelmed with traffic as a busy cut through from Woking to the A3/Guildford/M25 – it cannot cope in its current state, let alone take any further influx during development, construction, completion, nor post phases.
• I also object because this would further worsen the already excessive noise and pollution levels to the village of Send.

I object to the development of 40 houses and 2 travellers’ pitches at Send Hill

• I have been advised the subsoil of the proposed site contains documented unsafe landfill. It is irresponsible of GBC to even consider putting housing on such land and people’s lives at risk – I absolutely object to this.
• Access to the school is on Send Hill, already traffic is overloaded on this road at drop off and collection times. It is also often used as a cut through when there accidents on the northbound A3 – of which happens frequently. Once again the roads cannot take any further increase in traffic, not to mention the additional noise and pollution.
• Additionally this could give rise to making our children more vulnerable to traffic accidents and this is totally unacceptable.

I also object on the following points:-

• I object on the basis that it seems insufficient consideration has been given in general to the infrastructure needs for our villages and the matrix of roads/lanes connecting them.
• I object because I don’t see any provision for increase in bus services to the villages – something our elderly and disabled population would highly benefit from now let alone without further development.
• I object because there seems to be insufficient consideration to the amount of school places required to cater for the influx in housing planned, places and teaching staff currently available and the wide gap between these two figures. George Abbott is a bus ride away – what provisions for secondary school places are being given the go ahead for more locally?
• I object because there seems to be little consideration to the fact that crime may increase with the increase in homes planned – what provision and budget for crime prevention has been made?
• I object because there doesn’t seem to be any increase in funds for fire services.
• I object because what provisions have been made for the increase in demand for health services? The Villages Medical Centre is already overwhelmed and it can take at least a week before being able to see a doctor when trying to make an appointment. This is unacceptable in its current state let alone without further homes being developed in the area.
• Along Send Road (A247) there is a primary and junior school, there is also a playground. Why is Guildford Borough Council willing to make our children more vulnerable by seeking to increase traffic along the A247?

Questions which I believe remain unanswered to the community of Send and the surrounding villages follow:-
• How is the budgeted £150,000 per annum over the next 10 years for the development of the A247 between Woking and I assume the A3 (although could extend further??) deemed sufficient to satisfy the needs in regard to development programmes planned by Guildford Borough Council?

Ø At the last consultation meeting in Send the council representative in charge of infrastructure couldn’t even answer how that £150,000 per annum would be allocated and spent, nor had he even liaised with his counterpart at Woking Borough Council which he admitted during the open forum of the meeting. This seems ludicrous and utterly irresponsible when traffic on the A247 will affect and be affected by traffic flows linked to Woking. See above the proposed amount of houses proposed around Send and it doesn’t take someone even with GCSE maths to work out that is almost 6.5k homes, conservatively there will be 1.5 cars per home and that equates to nearly 10,000 additional cars on our tired roads on a daily basis, solely in this small area. That doesn’t even include visiting/travelling through/industrial traffic. THE INFRASTRUCTURE CAN’T TAKE IT AND WHAT WILL £150K PER ANNUM DO FOR THE SIMPLE A247 – NOT ENOUGH!

• How are the current deficiencies in infrastructure eg road repairs, funding for schools, health professionals, etc going to be addressed before any further housing development is given the go ahead in the area?

• What impact is Brexit imposing on the Local Plan – will the needs change with the changes that are inevitable because of Brexit? What directive has come out from the new National Government re the Local Plan and are these being taken into account?

• Why is 70% of the Green Belt in this area being targeted yet only 30% of Brownfield sites?

• Why is Guildford Borough Council including Send Hill in the proposal and therefore willing to build on unsafe landfill which could potentially put people’s lives at risk?

• Why is Guildford Borough Council prepared and willing to put children’s lives at potential risk by increasing traffic flow by the schools plus recreation ground, without including risk assessment and assurance to prevent this?

• Why will Guildford Borough Council not disclose their calculations for the area’s housing requirements to the public? What are they?

• Why will Guildford Borough Council not disclose the names of development investors to the public? Who are they?

• What provisions and budgets will be granted for services in the community including increases in policing, fire, medical and overall health services?

• How was it possible for the Garlick’s Arch proposal to be included in the latest Local Plan when it had not even feature as part of the previous one – how did this come on to the table and when, at what hour was it brought into the fold and how was it approved as a potential site?

• As the Garlick’s Arch site is subject to flooding - what will the knock on effects to others be eg in Send Marsh?

• What surveys have been and will be done to ensure endangered species of wildlife will not be disturbed and affected, but instead protected as their rights state?

• What surveys have been and will be carried out to ensure ancient trees and land is not destroyed and affected, but instead preserved?

• How does Guildford Borough Council’s plans dove tail with Surrey County Council’s, including highway planning, infrastructure, healthcare, schooling, policing, etc?

I request that satisfactory answers/solutions be provided and demonstrated to the community re these outstanding questions and I look forward to receiving them myself too by return email – thank you.

It only leaves me to say that decent human beings just want to live peacefully and quietly in these villages. Many have worked hard all their lives and contributed greatly in many ways including financially to the good of this country. I was already aware, but really noticed at the last consultation meeting in Send that many of the community are elderly in this village and will have undergone deep sacrifice through war years to survive and hold their lives together – something many of us will not even be able to comprehend. I request that whoever holds the decision on the planning matters truly considers this with their heart.

Receive money from overseas greedy developers who’s primary benefit is themselves, whilst they care little for the impact their greed has on our communities and daily existence. Or choose less greed, less wanting and instead support the great people of this country who have endured hardship and now are just choosing peacefulness and the ability to survive a crazy busy nonsense world. I’m a 46 year old woman also just trying to survive this crazy world and I just want to live
peacefully and quietly in the village Send is. We can all do with less and we can all do with going at a slower pace, leading simpler lives – it’s not all about the next best new thing or bowing to what others think we need.

Thank you for taking the time to read this and all other objections and comments submitted. The community you have requested comment from has taken the time to respond, I hope this will be listened to, heard, authentically and respectfully taken into account, and that action is then taken in a manner which upholds our great British values including integrity, honesty, fairness and that living in a democracy benefits those who live in these communities day in day out, not the greed of a small few.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: pslp171/2658</th>
<th>Respondent: 11113249 / Holy Trinity Amenity Group (HTAG) (Bob Bromham)</th>
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“On most local roads in the urban areas and in the villages there is at least one footway, and usually two.”

This is normal, but implies that there is no problem with footways. This is not true. They are not maintained, most curbing is now ineffective, and they are often too narrow – a problem aggravated by frontagers allowing hedges to encroach across much of the footway. We suggest this sentence is removed.

“Facilities to assist pedestrians in crossing roads are commonplace.”

This is also incorrect. There are some light controlled crossings, but not a single pedestrian priority crossing in the town. Many crossings at places indicated by dropped curbs and tactile paving are actually dangerous. Suggest replace “commonplace” by needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: pslp171/2663</th>
<th>Respondent: 11113249 / Holy Trinity Amenity Group (HTAG) (Bob Bromham)</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E6</td>
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“To achieve this we will support...proposals which promote greater use of the River Wey as a leisure and recreational resource without harming local biodiversity or water quality”. Add to this “and which do not degrade the natural and historic character of the riverside”. The Wey is a small navigable river, more akin to a canal, and therefore limited in its leisure potential mainly to walking, cycling, and enjoyment of nature. Other leisure developments are acceptable providing they do not remove the band of green riverside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2664  Respondent: 11113249 / Holy Trinity Amenity Group (HTAG) (Bob Bromham)  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We will also take opportunities to reconnect the town centre to the amenity of the riverside”. This implies that the town centre is disconnected from the riverside, which is not true. The High Street is the historic, retail and service centre of the town, the main attraction for visitors, and the “brand” for the town. Its connection with the riverside, via the clearly visible pedestrianised and historic town bridge, could hardly be bettered. We ask that “reconnect” be replaced with improve the connection of.

Policy E7. “41,000 sq m (gross) of additional comparison goods floorspace on the North Street regeneration site”.

As comment on P22 we consider this still to be too large.

Policy E7. “approximately 1,300 new homes”.

While we welcome the provision of some new homes in the town centre we consider this target too high, particularly because of the need to provide much new infrastructure to support it. We ask for the target to be reduced.

Monitoring indicator, 41,000sqm retail.

As P94, we consider this much too high, and unsupported by current predictions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2661  Respondent: 11113249 / Holy Trinity Amenity Group (HTAG) (Bob Bromham)  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
P37. “A flexible housing stock will help meet the wide range of accommodation needs ...”. The balance of house sizes required is being disturbed by excessive extensions that create overlarge properties. We ask that a clause be added: Large extensions will be refused if they would remove homes from the size groups in most demand.

P43. “Monitoring indicators - Permissions granted for different size and types of housing compared to the identified mix in the Strategic Housing Market Assessment”.

This must include extensions that increase the number of bedrooms in a house, if overall control is to be achieved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2668     Respondent: 11113249 / Holy Trinity Amenity Group (HTAG) (Bob Bromham)     Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

P129. (4) In terms of vehicular parking for new developments:

(a) in Controlled Parking Zones, or component areas thereof, in which the demand for on-street parking by residents of existing dwellings and, where allowed, ‘pay and display’ visitor parking exceeds the supply of designated on-street parking spaces, planning permission for new residential development resulting in a net increase in dwellings will be subject to a planning obligation to require that future occupants will not be eligible for on-street residents parking permits, with the exception of disabled people who will be eligible. We welcome this action to restrict residents parking permits. However we ask that no permits are issued in established residential areas for new dwellings, irrespective of the perceived demand; experience has shown that in most areas the demand is already too much.

P129. “(6) The provision and/or improvement of a car club by a new development will be supported if appropriate.”

Car clubs clearly support reduced car use, by their “pay as you go” system. We ask that the qualification “if appropriate” be deleted.

P130. “(11) The provision of additional public off-street car parking in Guildford town centre will be supported when it facilitates the interception of trips that would otherwise drive through the Guildford gyratory.”

We ask that this be reworded: that would otherwise drive through the town centre or surrounding residential areas. “Rat runs” are increasingly a problem along narrow residential roads, and create safety risks; problems are not limited to the gyratory.

P133. “Monitoring Indicators...Walking, cycling, bus and rail modal share for travel to work journey of Guildford borough residents”.

It is known that a significant proportion of the congestion traffic is caused by children being taken to schools around the centre, and that some are from outside Guildford. We suggest reword as “….for travel to work and school.”
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2659  Respondent: 11113249 / Holy Trinity Amenity Group (HTAG) (Bob Bromham)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Vision and objectives

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

P21. We welcome the reduction in housing numbers, but consider the target to be still too high and unsupported by evidence. We support the analysis provided by Guildford Residents Association, of which our Group is a member.

P22. We welcome the small reduction in the North Street redevelopment retail to 41,000sqm and the increase in dwellings from 200 to 400. However we consider the retail component still much too large, and not supported by current predictions. It would result in retail business being drawn away from the existing centre and its decline; the present town centre is what makes Guildford distinctive and attractive and it must remain vibrant. The increase in food/drink from 3,000 to 6,000sqm is also too large and will have a similar effect; taking account of all these changes there appears to be an increase of total floor area of around 9,000 sqm. for this site. The changes will result in a substantial increase in the amount of building demanded on this site; it will be so cramped that it will be impossible to achieve the quality development required. We ask that the total space requirement be reduced.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1640  Respondent: 11114721 / Elizabeth Wilcockson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
17. I OBJECT to the proposed Infrastructure Schedule (Appendix C) The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan for each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPA16/1634  **Respondent:** 11114721 / Elizabeth Wilcockson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I consider the calculation of housing need is unsubstantiated. The model has not been scrutinised and fundamental assumptions are flawed. Housing target is unconstrained;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPA16/1641  **Respondent:** 11114721 / Elizabeth Wilcockson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

18. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed.

There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant...
infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>PSLPS16/3133</th>
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I object specifically to proposed building on Gosden Hill Farm on Green Belt designated to prevent West Clandon being absorbed into a sprawling urban environment four times the size of the village it blights;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPS16/3143</th>
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14. I OBJECT to Gosden Hill development being in the Local Plan The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.
The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day. Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km. Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3140  Respondent: 11114721 / Elizabeth Wilcockson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/ Burnt Common (A43), would be treated as a Strategic Employment Site. The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

1. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

1. I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

1. I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3144  Respondent: 11114721 / Elizabeth Wilcockson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
15. I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brownfield site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
16. I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6820  Respondent: 11114721 / Elizabeth Wilcockson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that brownfield land would be disproportionately used for commercial development and unnecessary retail expansion. This means Green Belt land is used for housing development unnecessarily;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6859  Respondent: 11114721 / Elizabeth Wilcockson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.
Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house). I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6843  Respondent: 11114721 / Elizabeth Wilcockson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

13. I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London. Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve
the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6858   Respondent: 11114721 / Elizabeth Wilcockson   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

19. POLICY H3 – Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6822   Respondent: 11114721 / Elizabeth Wilcockson   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the fact that infrastructure has not been properly assessed and is inadequate to deal with current housing levels – roads, doctors, schools will not be able to cope;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6837  Respondent: 11114721 / Elizabeth Wilcockson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

1. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6838  Respondent: 11114721 / Elizabeth Wilcockson  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

11. I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6823  Respondent: 11114721 / Elizabeth Wilcockson  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object that housing on the Green Belt will increase traffic bringing increased danger and pollution and slower journey times on our already overcrowded village roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6839  Respondent: 11114721 / Elizabeth Wilcockson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

12. I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6818  Respondent: 11114721 / Elizabeth Wilcockson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to building on the Green Belt because the essential characteristic of Green Belt is its openness and permanence (National Planning Policy Framework paragraph 79);

I object to the changes to Green Belt boundaries. This is not justified by any very special circumstances. All the Green Belt sites meet the five purposes of the Green Belt;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6821  Respondent: 11114721 / Elizabeth Wilcockson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all other strategic sites in the Local Plan, Blackwell Farm, 3 Farms Meadows, Garlick’s Arch, West Horsley and Hog’s Back. All are out of proportion to the surrounding area and none qualify for the exceptional circumstances required to take them out of the Green Belt;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6832  Respondent: 11114721 / Elizabeth Wilcockson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.
Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6834  Respondent: 11114721 / Elizabeth Wilcockson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6825  Respondent: 11114721 / Elizabeth Wilcockson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including These now need to be revised downwards, possibly quite seriously.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough. The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Proposed Submission Local Plan (June 2016).

Over 20,000 responses objected to the 2014 draft Plan and therefore I Object that this Plan is not materially different and the Consultation Process has not been properly followed for this Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>SQLP16/1050</th>
<th>Respondent:</th>
<th>11114721 / Elizabeth Wilcockson</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
<td></td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that new sites have been proposed in this consultation which have not previously been considered, which is not appropriate at this stage;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPA16/1119</th>
<th>Respondent:</th>
<th>11115201 / Philip Colinese</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
<td></td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Infrastructure: The large number of proposed homes would have a significant impact on the need for road capacity. Burpham already is often swamped by traffic because of blockages on the A3. New roads would be needed on the proposed development sites but the Plan contains no provision for improvements to the A3 or local roads. Development on the Gosden Hill site, for example, would require major drainage provision for which no proposals are given. It would be a major flaw to permit development of the proposed sites without first settling on improvements to the A3, preferably by tunnelling under Guildford.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1415  Respondent: 11115201 / Philip Colinese  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Infrastructure: The large number of proposed homes would have a significant impact on the need for road capacity. Burpham already is often swamped by traffic because of blockages on the A3. New roads would be needed on the proposed development sites but the Plan contains no provision for improvements to the A3 or local roads. Development on the Gosden Hill site, for example, would require major drainage provision for which no proposals are given. It would be a major flaw to permit development of the proposed sites without first settling on improvements to the A3, preferably by tunnelling under Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5695  Respondent: 11115201 / Philip Colinese  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Green Belt: The Plan, if implemented, would mean a serious loss of Green Belt land in the vicinity. It does not provide adequate evidence that exceptional circumstances exist to justify taking over Green Belt land for strategic development. More consideration needs to be given to development on brownfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5689  Respondent: 11115201 / Philip Colinese  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Guildford Borough Council’s Draft Local Plan, June 2016. From consultation with others I have concluded that the Plan is unsound and unsustainable. My objections mainly relate to Housing Numbers, Infrastructure and Green Belt issues.

**Housing:** There is lack of evidence to support the alleged need for 693 new homes annually; double the previously quoted calculation and significantly higher than another independent estimate which I am aware of. That would mean about 40% of the total increase being built within a small radius of Burpham where I live. This, I believe, is disproportionately high.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: pslp173/512  Respondent: 11115361 / Alastair Lawson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Despite the changes made to the latest plan I am confident that the 20,000 comments made on the previous plan will still be considered and not ignored.

This is especially important as:

- While the numbers of homes to be built has been reduced there is still no evidence to back-up how the figure has been agreed
- The need for Green Belt protection from over development, merging of villages remains – there should be no changes to this policy
- The requirement for infrastructure to be committed before building must be ratified

It was heartening to hear Mr Gove in a speech on 20 July, as Environment Secretary state he has ‘no intention of weakening environmental protections put in place while in the EU’. He even said he wanted post-Brexit UK to be a ‘a setter of gold standards for protecting our natural world.’

My comments for the Regulation 19 Consultation are:

- Removal of sites Policies 46 / 47
- Change to the Green Belt coverage of Normandy and Flexford
- Infrastructure improvements
- Traveller sites in Normandy and Flexford

**Removal of sites Policies 46/47**

I am naturally pleased that common sense has prevailed – not to double the size of Normandy and Flexford by building 1,100 houses and a school in our precious Green Belt: it’s the wrong place, fed by country lanes, with dangerous railway bridges, is a floodplain and also… Green Belt!

So I support this changes to the plan.

I do hope that the GBC do not go back on this by allowing greedy developers in through the back-door to propose any level of development or to remove Green Belt cover in the future.

**Change to the Green Belt coverage of Normandy and Flexford**

I am not clear why GBC have ignored the policy of the Green Belt and seem keen to try to find ‘exceptional circumstances’ where it can to build its unsubstantiated housing target.

I object to the change in the plan to remove the Green Belt coverage in settlements in Normandy, Flexford and Walden Cottages marked on the maps in Appendix H. There is no evidence to prove why these random areas have been selected as all contribute, as do the settlement areas not selected, to the openness of the Green Belt and no ‘exceptional circumstances’ have been proved. This openness has in fact been stated by the planning inspectorate in previous planning appeals. The area around these selected settlements do also contribute to the rural economy. They also are close enough to the Surrey Hills ANOB given the geography of the land allowing views that fulfil the Green Belt obligations. The area has already been identified as one of ‘high sensitivity’ yet that doesn’t seem to count when this insetting has been proposed. If this was allowed to happen then there will be pressure in the future to join up the resultant ‘urban islands’ into a wider urban area.

The Green Belt was created to prevent urban sprawl and should be permanently protected.

I also object to the statement under Green Belt Policy P2 (4.3.13) that claims Normandy and Flexford (and many other villages) are now inset from the Green Belt. Its in the Plan to do that very thing - so cannot be right. I also object to any of these villages being changed to be inset from the Green Belt.

**Infrastructure improvements**

With all the current development and proposed around the area – especially in the sacrificial lamb Ash – the pressure on roads, Doctors etc will only get worse.

It is vital that the infrastructure is agreed and implemented before any large scale development takes place.

The most key are LRN17 Puttenham Hill/A31, LRN24 A323/324 Junction and LNR21 Ash Railway Station flyover and I support the plans - although the ‘likely cost and funding source’ don’t appear to be very robust.

**Traveller Sites in Normandy and Flexford**

Like the settlement areas in Normandy, Flexford and Walden Cottages, the sites at Palm House Nurseries (Policy 49) and Whittles Drive (Policy A50) are proposed to be inset.

I object to this as it will remove the development restrictions in an area sensitive to residents in the village of Normandy and Flexford and no evidence has been provided for ‘exceptional circumstances’. I can foresee that it will result in even less respect for the planning law.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Comment ID: PSLPA16/4239  Respondent: 11116001 / Audrey Bennett-Davies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a resident of West Horsley for over 25 years and having now lived in East Horsley for 6 years, I am writing to **object strongly** to the draft local plan for the following reasons:

GBC has failed to disclose how they arrived at the number of homes needed. Two separate investigations have worked on the figures and shown the number of homes (13,860) to be in excess of the number apparently needed.

**I object** to a plan which proposes that over 65% of these new houses should be built on Green Belt land. There is a great deal of brown field land that could be used in the Guildford urban area, some of which I understand you propose to reserve for office, retail and industrial use, but obviously developers prefer to start on virgin Green Belt land.

**I object** to the removal of West and East Horsley from the Green Belt by “insetting” and extending the 2003 Local Plan Settlement Area boundaries for no apparent and justifiable reason.

**I object** to the removal of 12 other villages from the Green Belt. No exceptional circumstances have been identified by GBC that would allow allow the use of Green Belt land for a large amount of house building.

**I object** to the number, density and sustainability of new housing in The Horsleys. Most of the roads in The Horsleys are narrow, many have no pavements. I frequently have to stop and reverse to allow a bus or lorry to pass, or mount the pavement where there is one. When two lorries meet, it often creates a traffic jam, as they struggle to pass one another. This is especially the case in Ockham Road South. Our roads are narrow, rural roads, which cannot be widened and it will surely not be long before a pedestrian is injured by a car or lorry mounting the pavement.

Neither West nor East Horsley offers the prospect of employment, therefore the occupants of these proposed new houses will need to drive or take the train, mainly one assumes to London or Guildford. This will result in many more vehicles on the roads, adding to **air pollution**. Moreover, by mid morning each weekday, the Horsley Station Car Park is usually completely full, so that parking will become impossible for many of those wishing to commute to London. The Proposed Local Plan makes no provision for additional parking at Horsley or Effingham Junction, nor is there any room for such. Neither does it make any attempt to ease the already severe congestion on the A3 and M25.

GBC apparently voted unanimously against the large scale development on land at the former Wisley Airfield site, yet it remains in the Local Plan. If these houses are built, the parking facilities at Horsley and Effingham stations will be completely overwhelmed and there will be severe congestion from cars attempting to drop off and pick up commuters.

Already, it can be very difficult to park in East Horsley in order to shop, visit the hairdresser or borrow a book from the Library. East Horsley Village Hall has insufficient parking when there is a big meeting in the hall, so all available parking in the village is used by those attending.

It is already impossible to park at the Medical Centre at busy times, so where will all the proposed new residents park and, given how busy our doctors are now, how will it be possible to provide for the vastly greater number of appointments that will be needed to serve a much enlarged population?

**I object** to the fact that East, and particularly West Horsley, are being asked to take a far greater number of new houses in proportion to the existing number of houses than anywhere else in the borough. Moreover the proposed density of houses planned is far greater than the density of existing housing in the villages.
I object, as stated earlier, to the fact that The Horsleys and 12 other villages are being insetted from the Green Belt, while in Ash and Tongham, new Green Belt is to be created. There is surely more employment opportunity in that part of Guildford Borough.

The Horsleys are attractive to developers because they are such lovely villages to live in. Although a proportion of these houses are supposed to be affordable homes, it is difficult to discover what the cost of an affordable home in The Horsleys would be. There is undoubtedly a need for a small number of smaller homes for local downsizers and young people wishing to stay in or return to their home village. This was established in a survey carried out by West Horsley Parish Council in 2014. Nevertheless, it is unlikely that the demand would be great or the price low enough. If developers can show that there is insufficient demand for affordable homes, they are then allowed to opt out and build expensive and more profitable homes instead. That is the attraction of building houses in The Horsleys, rather than in the urban area or on the other side of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17320  Respondent: 11116001 / Audrey Bennett-Davies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Over 65% of the proposed housing is planned for land currently in the Green Belt. The Government has stated that housing need is not a reason for protected Green Belt Land being used to provide it.

In conclusion, I object to the Local Plan as it seeks to remove the Green Belt from our villages and places a far greater housing burden on West Horsley proportionate to the current number of houses, than anywhere else in the borough. It provides for no additional infrastructure or facilities and is largely a developers’ charter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18652  Respondent: 11119265 / Guildford Environmental Forum (Raymond Smith)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We consider that there is no objectively assessed need for housing yet established, since the figure used is based on a Strategic Housing Market Assessment that is not transparent in its methodology. Whilst the document has been produced externally to the Council, by established practitioners in the field, and claims to have produced a measure of the “objectively assessed needs” we understand that the methodology used by them is (still) being claimed to be confidential. With the lack of opportunity for peer review of the process, let alone public examination of it, the document and its conclusions cannot be considered to be “objective”. Any plan based on this must be considered to be unsound.

In general there are areas of great concern, for example the delays in providing the necessary infrastructure before any increase in housebuilding (congestion on the A3 is not being addressed until well over 5 years time). Public transport solutions would, however, be far more sustainable than proposals to keep upgrading the A3, which are likely to have limited benefits. There do not seem to be co-ordinated plans for improving air quality, reducing CO2 emissions or preventing biodiversity loss. These sections need to move beyond platitudes. The big increase proposed in retail space is also a negative aspect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/16876  **Respondent:** 11119265 / Guildford Environmental Forum (Raymond Smith)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Whilst there are good aspects of the Proposed Submission Local Plan: strategy and sites 2016 we consider it to be deeply flawed in critical areas, detailed below. Since so much of the Plan flows from these flawed origins we are not commenting on the detail of the Plan.

We consider the Draft Local Plan is unsound since it fails to recognise the constraints placed on the objectively assessed needs for housing by the Green Belt. It is quite clear in the government guidance on the NPPF that objectively assessed needs are constrained by designations such as the Green Belt.

“The Framework is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or specific policies in the Framework indicate development should be restricted. Such policies include those relating to sites protected under the Birds and Habitats Directives, and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, .....”

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/6689  **Respondent:** 11136993 / Elliot Machin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A44
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Send Hill is a very narrow country lane, unsuitable for travellers large vehicles. Subsoil of the proposed site contains documented unsafe landfill waste.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14041  Respondent: 11136993 / Elliot Machin  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The industrial space is not needed and should remain at Slyfield

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14038  Respondent: 11136993 / Elliot Machin  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Traffic volume, the roads in the above mentioned areas already struggle with the burden of traffic, the roads being in a state of disrepair.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14039  Respondent: 11136993 / Elliot Machin  Agent: 

Page 1493 of 2855
An addition of said developments would add to this already major problem. The Portsmouth Road, Send Road and Send Marsh Road are already overloaded. With further large developments, these roads would be gridlocked.

Noise and pollution levels are already at excessive levels!

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/14037  **Respondent:** 11136993 / Elliot Machin  **Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The following points listed are my objections to Ripley, Send and Send Marsh villages being removed from the Green Belt & the development of the following areas:

- Clockbarn Nursery
- Garlick's Arch
- Send Hill
- A3 at Burnt Common

The Green Belt was intended for permanent intentions, by the National Policy Framework.

The above mentioned villages were intended as buffers between the towns of Guildford and Woking.

The clear election promise of protecting our Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/14040  **Respondent:** 11136993 / Elliot Machin  **Agent:**
Flooding is already an issue in Send Marsh.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Wisley VillageInset.pdf (137 KB)

Comment ID: PSLPS16/7909  Respondent: 11149217 / Royal Horticultural Society (Sir or Madam)  Agent: Montagu Evans LLP (Montagu Evans)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The allocation of Wisley Airfield for housing is an issue for the Borough Council to determine. However, the RHS does object to the allocation of a 16.98 hectare waste use in the north-west corner of the site as identified within the Surrey Waste Plan (2008). RHS Wisley is internationally renowned and contains rare collections of plants, some of which are extremely sensitive to environmental change. Biological aerosols created by the waste material will be carried in the air and will have a significant detrimental impact on the sensitive ecosystem at Wisley. RHS Wisley is strongly opposed to the provision of a waste facility within such close proximity to the Gardens.

In relation to a new settlement at the Wisley Airfield site, the RHS is cautious of the impact of the proposed increase in traffic movements, pollution to air and groundwater supplies, and development on the Ripley roundabout. In view of the emerging Wisley Masterplan the RHS encourages a thorough assessment of the impacts on existing uses, the highway network and that all impacts are mitigated.

Finally, the RHS is encouraged by the sustainable transport requirements including a significant bus network, detailed in Policy A35 which will help to mitigate impacts on the existing highway network.

Conclusions

In principle, the RHS is largely in support of the policies proposed within the Guildford Borough Proposed Submission Local Plan: Strategy and Sites, July 2016 document, aside from the comments raised above.

In the context of the importance of RHS Wisley to horticulture, science, education, communities, health and the local economy, we hope that the Council will recognise the benefits of greater flexibility by removing the village and garden from the Green Belt.

The RHS consider this to be a positive recommendation which will help to meet the aims and objectives detailed in the Local Plan whilst aiding the continued development of the Garden and the value it brings to the Borough. We therefore trust that the Council will accept our representations.

Please can you ensure that our details are recorded on the database for future consultation. We also take this opportunity to continue to reserve our ability to appear at the Examination in Public of the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/7910  Respondent: 11149217 / Royal Horticultural Society (Sir or Madam)  Agent: Montagu Evans LLP (Montagu Evans)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: RHS Wisley Inset.pdf (58 KB)

Comment ID: PSLPP16/17413  Respondent: 11149217 / Royal Horticultural Society (Sir or Madam)  Agent: Montagu Evans LLP (Montagu Evans)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The criteria required for granting planning permission for new development in urban areas and inset villages is supported by the RHS.

At this stage, we would like to reiterate the request for Wisley Gardens and Wisley Village to be included as an inset within the Green Belt.

Aside from the land owned by the RHS at Wisley Village (which is the majority lying east of the River Wey) there are significant other employers and business in the village including the National Trust Regional Offices.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17412  Respondent: 11149217 / Royal Horticultural Society (Sir or Madam)  Agent: Montagu Evans LLP (Montagu Evans)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
As outlined above, RHS Wisley is the top paid attraction within the Borough of Guildford and is the largest tourist attraction within Surrey.

The vision to continue to develop a high quality visitor experience as detailed in Policy E6 is supported however, to inset the Garden from the Green Belt would provide the planning policy support required to deliver this objective.

We propose that greater prominence is given to Wisley Gardens in the Plan to take account of its Regional, National, and International significance and visitiorship.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/17410  **Respondent:** 11149217 / Royal Horticultural Society (Sir or Madam)  
**Agent:** Montagu Evans LLP (Montagu Evans)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

RHS Wisley accommodates the main education and research function of the Society and the RHS School of Horticulture is based at RHS Wisley. This offers Diplomas in Horticulture and a Master of Horticulture. As part of its development, the Society is seeking to expand its educational activities further based upon its reputation as a centre of excellence for horticultural research. Volunteers, interns, apprentices and students all benefit from the Society’s work at Wisley through the programme that are run by the Society.

The RHS welcomes the inclusion of the reference to the RHS School of Horticulture at RHS Wisley at paragraph 4.2.16 as one of the further and higher education establishments located within the Borough. The Society see that accommodation for its own key worker staff is included in this category as a result of their staff development programme.

Within the previous representations (September 2014) it was set out that the RHS’s desire is in the long term to be able to provide additional student accommodation within Wisley Village with teaching and research facilities. The investment in student accommodation will complement the society’s aspirations to expand the range of higher education courses it offers. It is appreciated however that additional development is constrained by the TBHSPA and Green Belt policy, which will have to be addressed to enable this development to proceed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/17414  **Respondent:** 11149217 / Royal Horticultural Society (Sir or Madam)  
**Agent:** Montagu Evans LLP (Montagu Evans)
As stated previously, RHS Wisley is the most popular tourist / cultural attraction in the Borough, and is one of the world’s most significant gardens. The Garden is one of the top attractions in England and has approximately 1 million visitors per year with the anticipation of visitor numbers increasing to 1.4 million visitors by 2023.

Enhancing and maintaining the quality of the visitor experience and providing the necessary facilities for these numbers is of the utmost importance to the Society. As part of the recent planning application submissions, forms of sustainable transport were reviewed alongside the exploration of promoting more sustainable forms of transport and how existing parking facilities can be used more efficiently.

Through this process and the ongoing masterplan exercise, all reasonable endeavours will be undertaken to explore sustainable transport methods that can be implemented to mitigate against the potential impacts of increasing visitor numbers. These measures need to be appropriate to the needs and demographic of the majority of visitors to RHS Wisley. It is noted that the number of visitors to Wisley changes through the week and season, but largely fall outside of peak hours where highway network congestion is at its greatest.

Due to the current physical constraints of the site and its rural location, including narrow roads to the north and west and the A3 and M25 to the east and south, providing safe alternative transport methods is challenging. Planned improvements to the M25 Junction 10 would be welcomed.

With that said, the RHS support the aims of Policy 13 and are encouraged that the policy wording incorporates ‘where appropriate’. This acknowledges the difficulties new developments face within rural areas of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Both RHS Wisley and Wisley village are located within the Metropolitan Green Belt.

The RHS has been located at Wisley for over 100 years, and Wisley is the RHS’s flagship garden. It is therefore not just a garden but is the headquarters of the RHS. Consequently it contains built development to provide offices, a centre for research, education, an extensive horticultural library, restaurants and cafes, retail, tourism and leisure, and maintenance. All of these are ancillary to the main Garden and are necessary for the RHS to function and thrive. Consequently, these facilities need to have the ability to adapt and evolve in accordance with the primary use and function of the Garden.
Green Belt policy is not an effective way to control development at Wisley. The Garden requires the flexibility to adapt and we therefore propose that part of the Garden is excluded from the Green Belt in previously developed areas where the principle of development is either established or to be established by future planned development.

Policy P2 states:

“We will continue to protect the Metropolitan Green Belt, as shown on the proposals map, against inappropriate development. In accordance with national planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.

Certain forms of development are not considered to be inappropriate. Proposals will be permitted where they are consistent with the exceptions listed in national planning policy and, where relevant, also meet the following criteria:

Extensions or alterations
The extension or alteration of a building provided that it would not result in disproportionate additions over and above the size of the original building.

Replacement buildings
The replacement of a building, provided the new building:

• would be in the same use, and
• is not materially larger than the one it replaces, and
• is sited on or close to the position of the existing building.

Limited infilling
Limited infilling within the identified settlement boundaries of the following villages: Albury, Compton, East Clandon, East Horsley (south), Gomshall, Holmbury St Mary, Peaslake, Pirbright, Puttenham, Shere, West Clandon and Worplesdon.

Limited infilling may also be appropriate outside the inset or identified settlement boundaries, and in the following villages, where it can be demonstrated that the site is as a matter of fact on the ground within the village: Artington, Eashing, Farley Green, Fox Corner, Hurtmore, Ockham, Seale, Shackleford, The Sands, Wanborough and Wisley.”

It is considered that the wording of this policy is not clear and therefore the following alterations to the wording is suggested:

“We will continue to protect the Metropolitan Green Belt, as shown on the proposals map, against inappropriate development. In accordance with national planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.

Certain forms of development are not considered to be inappropriate. Proposals will be permitted where they are consistent with the exceptions listed in national planning policy and, where relevant, also meet the following criteria:

Extensions or alterations
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Limited infilling within the identified settlement boundaries of the following villages:
Albury, Compton, East Clandon, East Horsley (south), Gomshall, Holmbury St Mary, Peaslake, Pirbright, Puttenham,
Shere, West Clandon, and Worplesdon and Wisley.

Limited infilling may also be appropriate outside the inset or identified settlement boundaries, and in the following villages,
where it can be demonstrated that the site is as a matter of fact on the ground within the village: is contained on at least 3
sides by built development:
Artington, Eashing, Farley Green, Fox Corner, Hurtmore, Ockham, Seale, Shackleford, The
Sands, and Wanborough and Wisley.”

Previously, a proportion of Wisley Garden was proposed to be allocated as a Major Previously Developed Site within the
Draft Local Plan Strategy and Sites Document.

Since the Draft Local Plan Strategy and Sites Document was published, national planning policy and guidance now refers
to limited infilling as an exception to development in the Green Belt. Paragraph 89 of the National Planning Policy
Framework (NPPF) outlines exceptions to the construction of new buildings as inappropriate in the Green Belt. These
exceptions include the following:

“Limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether
redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of
the Green Belt and the purpose of including land within it than the existing development.”

The exception of ‘limited infilling’ is incorporated within Policy P2. However, Wisley Garden and Village are not currently
proposed to be an inset in the Green Belt in the Submission Local Plan: Strategy and Sites document. The principle of the
exception therefore only applies to land at Wisley that is previously developed and would not have a greater impact than
existing development. This does not serve the purpose of the Society. When development is planned at Wisley the need to
improve facilities to meet future demand naturally means that development will be larger and therefore a subjective
judgement is applied to determine whether this is a greater impact on the Green Belt or whether very special circumstances
exist. In order to provide greater clarity, we proposed that the Garden and Village are removed from the Green Belt.

The garden at Wisley is definably a previously developed site, within the Green Belt, which is constantly evolving,
reflecting and supporting the work of the Society. On the basis that RHS Wisley has been formerly considered as a
previously developed site, we would propose that the gardens and village are included as an inset within the Green Belt
within adopted policy. This would allow for limited infilling and the redevelopment of brownfield land within the village
and garden.

Land at Wisley Village could provide a potential future housing site. This would reduce the need for development to be
directed to the Green Belt and could form a more sustainable option as well as creating a critical mass for a more
sustainable community at Wisley.

To support the allocation of land within the village for housing an assessment of the following would need to be submitted
in support to inform such proposals. This assessment would consider the following issues:

- Flooding;
- Access; and
- Ecology

A smaller scale of housing of approximately 15 units through infilling could be delivered in the plan period. This approach
would aid the delivery of the Borough’s housing targets. With that said, we hope the request to include Wisley Gardens and
the Village as an inset within the Green Belt will be supported.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We suggest that the significance of the Society as a contributor to the Borough is given as much prominence in the Plan as for example Surrey University and Watts Gallery that are included. With the volume of staff and volunteers engaged at Wisley the site is a significant employer and generator of financial activity within the Borough.

We suggest that the significance of the Society as a contributor to the Borough is given as much prominence in the Plan as for example Surrey University and Watts Gallery that are included. With the volume of staff and volunteers engaged at Wisley the site is a significant employer and generator of financial activity within the Borough.

The charitable purpose of the RHS is to inspire passion and excellence in the science, art and practice of horticulture. RHS Wisley is vital to the ability of the charity to deliver its purpose. The Garden is the most effective tool for educating the public (both adults and children) about horticultural skills for growing food and ornamental plants, science and environmental issues, as well as design It also acts as the base for all its public facing outreach work, including in local communities and schools.

The RHS has recently undertaken a comprehensive masterplanning process exploring the suitability of the existing ageing facilities and infrastructure at Wisley to meet the RHS’s longer term objectives as set out within the Masterplan Vision. This identified improvements to existing facilities at the Garden that are necessary to accommodate the projected increase in visitor numbers, and the Society has publically committed to a major investment at Wisley, alongside a Strategic Investment Programme that will be a step change to the Society’s charitable delivery in coming years. It is a pivotal moment for the RHS.
The following projects have been identified through the masterplanning process as being necessary to accommodate this growth at Wisley:

- Improvement to the garden entrance and retail facilities;
- Enhancement of the Laboratory building;
- A new National Centre for Horticultural Science and Learning;
- New office accommodation for a larger work and volunteer force;
- Improvement to the horticultural support (machinery yard and glass houses); and
- A new staff car park to avoid conflict with visitors.

This masterplan is now in the process of being implemented and the following planning applications were formally submitted to Guildford Borough Council (GBC) in April and May 2016 and are currently being determined by GBC planning department:

- The Barn (application reference: 16/P/00954) – New office accommodation;
- Hilltop (application reference: 16/P/00976) – A new National Centre for Horticultural Science, and Learning;
- Front of House (application reference: 16/P/01080 & 16/P/01081) - Improvement to the garden entrance and retail facilities and enhancement of the Laboratory building; and
- New Substations (application reference: 16/P/01037).

The RHS want to ensure that the Local Plan supports the delivery of the masterplan for Wisley and the continual improvement of the Garden. The GBC Proposed Submission Local Plan: Strategy and Sites document forms the final consultation version of the GBC Local Plan following the consultation of the Draft Local Plan Strategy and Sites Document in the summer of 2014.

Below we set out our representations in response to the Proposed Submission Local Plan: Strategy and Sites document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17409  Respondent: 11149217 / Royal Horticultural Society (Sir or Madam)
Agent: Montagu Evans LLP (Montagu Evans)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S2 states:

“During the plan period (2013-33), we will make provision for 13,860 new homes, 37,200 – 47,200 sq m of office and research and development (B1a and b) floorspace and 4.7 – 5.3 hectares of industrial (B1c, B2 and B8) employment land to help meet the needs for new homes, support the economy and supply 3,200 additional B class jobs.

The delivery of homes is expected to increase over the plan period, reflective of timescales associated with the delivery of strategic sites and infrastructure. The housing target each year is as set out below, however, this is not a ceiling, and earlier delivery of allocated sites will be supported where appropriate, subject to infrastructure provision.”
The RHS are supportive of this strategy and the provision of new homes and employment land across the Borough from strategic, allocated and non-allocated sites. Wisley Village provides opportunities for new housing subject to policy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

**Comment ID:** pslp172/4239  **Respondent:** 11149217 / Royal Horticultural Society (Sir or Madam)  **Agent:** Montagu Evans LLP (Montagu Evans)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The allocation of Wisley Airfield for housing is an issue for the Borough Council to determine. It is noted that this allocation has increased in size from 93 ha to 96 ha with the inclusion of a further parcel of land. The RHS welcomes the inclusion of mitigation schemes to address issues on rural roads surrounding the site and the requirement for development to have sensitive design at site boundaries that has significant regard to the transition from village to greenfield.

However, the RHS continues to object to the allocation of a 16.98 hectare waste use in the north-west corner of the site as identified within the Surrey Waste Plan (2008) and allowed through appeal reference APP/B3600/A/09/2098568 on 8 March 2010. Here it is important to note that this consent has now lapsed and has not been implemented. RHS Wisley is internationally renowned and contains rare collections of plants, some of which are extremely sensitive to environmental change. Biological aerosols created by the waste material will be carried in the air and will have a significant detrimental impact on the sensitive ecosystem at Wisley. RHS Wisley is strongly opposed to the provision of a waste facility within such close proximity to the Gardens.

Our previous comments remain on the impact of proposed increase in traffic movements, pollution to air and groundwater supplies, and recent information arising from the impending Appeal hearing give greater concern that these environmental issues will affect the garden.

**Conclusions**

In principle, the RHS is largely in support of the policies proposed within the Guildford Borough Proposed Submission Local Plan: Strategy and Sites, June 2017 document, aside from the comments raised above.

In the context of the importance of RHS Wisley to horticulture, science, education, communities, health and the local economy, we hope that the Council will recognise the benefits of greater flexibility by removing the village and garden from the Green Belt, given its established nature.

As a Grade II* Registered Park and Garden and an internationally significant scientific collection Wisley garden is at threat from environmental change including local developments that affect the air, temperature, groundwater, and soil conditions, alongside visual impact and noise. The Society seeks protection of this garden, which is of global horticultural scientific importance, with appropriate mitigations from planned developments that affect it and its future.

Furthermore the Society seeks specific recognition in the Plan of its site and the activities that take place at Wisley to the benefit of Guildford Borough Council, and through co-operation, Woking Borough Council.
The RHS consider this to be a positive recommendation which will help to meet the aims and objectives detailed in the Local Plan whilst aiding the continued development of the Garden and the value it brings to the Borough. We therefore trust that the Council will accept our representations.

[Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- Appendix_2__GBC_Local_Plan_Nov_2013.pdf (74 KB)
- Appendix_1__GBC_Local_Plan_June_2016__RHS_Wisley_Representations1.pdf (413 KB)

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<th>Comment ID: pslp171/1923</th>
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The emphasis on high quality design and criteria for new development to achieve in terms of character and design is supported by the RHS.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp171/2539</th>
<th>Respondent: 11149217 / Royal Horticultural Society (Sir or Madam)</th>
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Enhancing and maintaining the quality of the visitor experience and providing the necessary facilities for the increased number of visitors is of the utmost importance to the RHS. As part of the recent planning consents forms of sustainable transport were reviewed alongside the exploration of promoting more sustainable forms of transport and how existing parking facilities can be used more efficiently.

Through this process and the ongoing masterplan exercise, all reasonable endeavours will be undertaken to explore sustainable transport methods that can be implemented to mitigate against the potential impacts of increasing visitor numbers. These measures need to be appropriate to the needs and demographic of the majority of visitors to RHS Wisley. It
is noted that the number of visitors to Wisley changes through the week and season, but largely fall outside of peak hours where highway network congestion is at its greatest.

Due to the current physical constraints of the site and its rural location, including narrow roads to the north and west and the A3 and M25 to the east and south, providing safe alternative transport methods is challenging.

The planned improvements to the M25 Junction 10 are welcomed subject to their detailed design, which is currently being discussed by the RHS with Highways England, with ‘improved access to Wisley Garden’ being a specific aim of the highways improvement. The RHS is opposed to any landtake from their RPG site, and seeks an appropriate local road network to support its operations, as well as a Junction 10 solution.

Policy ID3 has been amended to include requirements for new developments to meet including maximising the use of walking, cycling and public and community transport. This policy now requires developments to meet criteria outlined rather than expect and incorporate sustainable transport modes where appropriate, which is how the policy was previously worded.

Whilst the RHS support the aims of Policy ID3 and seeks to encourage, where possible, sustainable transport modes, it is important that flexibility is applied to new developments within rural areas of the borough where there is reliance on vehicular use.

With that said, we request that the policy wording incorporates ‘where appropriate’ with regards to rural areas of the borough as previously included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1918  Respondent: 11149217 / Royal Horticultural Society (Sir or Madam)  Agent: Montagu Evans LLP (Montagu Evans)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We have prepared representations on behalf of our client, the Royal Horticultural Society (RHS), in response to the June 2017 Guildford Borough Proposed Submission Local Plan: Strategy and Sites (Reg 19). These representations should be read in conjunction with those dated 14 July 2016 submitted against the Proposed Submission Local Plan: Strategy and Sites (June 2016)) (see Appendix 1), submitted on the 22 September 2014 against the Local Plan Strategy and Sites Draft Local Plan (July 2014) and 27 November 2013 submitted against the Issues and Options Draft Local Plan (October 2013) (Appendix 2) in relation to both Wisley garden and village.

Background

As set out in previous representations, RHS Wisley is the flagship garden for the Royal Horticultural Society. The Society is the UK’s leading horticultural charity and for over 200 years has promoted the Science, Art and Practice of Horticulture. The reach of the RHS is very broad, encompassing gardeners, schoolchildren, the horticultural trade and the science community, all worldwide. These activities and principles have become embedded at RHS Wisley for over a century and the 1905 Laboratory building remains the focus for the Gardens. Surrounding this is approximately 200 acres of formal and informal gardens, glass houses and outbuildings. In addition, Wisley Village is largely owned by the Society and supports
the operation of the Garden and in particular the Society’s educational activity by accommodating students and science activities through specialist research buildings and trial fields.

RHS Wisley is the top paid attraction within the Borough of Guildford and is the largest tourist attraction within Surrey, currently drawing in more than 1.2 million visitors a year, and targeted to rise to 1.4m by 2023. This is of national significance, compared with some 0.8 million at the Eden Project and 1.3 million at the Royal Botanic Gardens at Kew. The gardens are of international significance through its global reach and proximity to international airports at Heathrow and Gatwick. With some 400 staff and more than 200 volunteers engaged at Wisley the site is a significant employer and generator of financial activity within the borough.

We suggest that the significance of the Society as a contributor to the Borough is given as much prominence in the Plan as for example Surrey University and Watts Gallery that are included. With the volume of staff and volunteers engaged at Wisley the site is a significant employer and generator of financial activity within the Borough.

The charitable purpose of the RHS is to inspire passion and excellence in the science, art and practice of horticulture. RHS Wisley is vital to the ability of the charity to deliver its purpose. The Garden is the most effective tool for educating the public (both adults and children) about horticultural skills for growing food and ornamental plants, science and environmental issues, as well as design. It also acts as the base for all its public facing outreach work, including in local communities and schools.

The RHS has recently undertaken a comprehensive masterplanning process exploring the suitability of the existing ageing facilities and infrastructure at Wisley to meet the RHS’s longer term objectives as set out within the Masterplan Vision. This identified improvements to existing facilities at the Garden that are necessary to accommodate the projected increase in visitor numbers, and the Society has now embarked on a major investment at Wisley as part of a Strategic Investment Programme that is a step change to the Society’s charitable delivery and national profile. It is a pivotal moment for the RHS.

The following projects have been identified through the masterplanning process as being necessary to accommodate this growth at Wisley:

- Improvement to the garden entrance and retail facilities;
- Enhancement of the Laboratory building;
- A new National Centre for Horticultural Science and Learning;
- New office accommodation for a larger work and volunteer force;
- Improvement to the horticultural support (machinery yard and glass houses); and
- A new staff car park to avoid conflict with visitors.

This masterplan is now in the process of being implemented and the following planning applications have been consented:

- The Barn (application reference: 17/P/00796 (approved on 1 June 2016)) – New office accommodation;
- Hilltop (application reference: 16/P/00976 (approved on 30 September 2016)) – A new National Centre for Horticultural Science, and Learning;
- Front of House (application reference: 16/P/01080 & 16/P/01081 (approved on 30 September 2016)) - Improvement to the garden entrance and retail facilities and enhancement of the Laboratory building; and
- New Substations (application reference: 16/P/01037 (approved on 22 July 2016)).

The RHS want to ensure that the Local Plan supports the delivery of the masterplan for Wisley and the continual improvement of the Garden, for itself and as part of the local community. The GBC Proposed Submission Local Plan: Strategy and Sites Reg. 19 document forms the final consultation version of the GBC Local Plan following the consultation of the Proposed Local Plan Strategy and Sites Document in the summer of 2016.

Below we set out our representations on behalf of the RHS in response to the Proposed Submission Local Plan: Strategy and Sites document.

**Policy S2: Borough Wide Strategy**

Policy S2 states:
“During the plan period (2015-34), we will make provision for at least 12,426 new homes, 36,000 – 43,700 sq m of office and research and development (B1a and b) floorspace and 3.7 – 4.1 hectares of industrial (B1c, B2 and B8) employment land to help meet the needs for new homes, support the economy and supply 3,200 additional B class jobs. The delivery of homes is expected to increase over the plan period, reflective of timescales associated with the delivery of strategic sites and infrastructure. The housing target each year is as set out below, however, this is not a ceiling, and earlier delivery of allocated sites will be supported where appropriate, subject to infrastructure provision.”

The RHS are supportive of this strategy and the provision of new homes and employment land across the Borough from strategic, allocated and non-allocated sites. Wisley Village and the RHS owned land there, provides opportunities for new housing subject to other policies within the plan. As part of the RHS strategy the village is now being managed to provide increased open market lettings that contribute to housing needs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- Appendix_2_GBC_Local_Plan_Nov_2013.pdf (74 KB)
- Appendix_1_GBC_Local_Plan_June_2016_RHS_Wisley_Representations1-2_Redacted.pdf (414 KB)
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as III as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

I have lived in the village of West Clandon for 17 years and during that time traffic congestion has got much worse, with increasing numbers of lorries travelling through a very narrow and restricted road causing risks to pedestrians and to the detriment of village life. Whenever there is a problem with the A3, traffic uses West Clandon as a cut through and it is often impossible and dangerous to try and exit from Oak Grange Road. The proposals in the local plan will only make these matters worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.
It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.
The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brownfield site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).
The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/15844</th>
<th>Respondent:</th>
<th>11150913 / Sarah Marshall</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/15851  Respondent: 11150913 / Sarah Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15852  Respondent: 11150913 / Sarah Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15841  Respondent: 11150913 / Sarah Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15842  Respondent: 11150913 / Sarah Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.
Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15843   Respondent: 11150913 / Sarah Marshall   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15854   Respondent: 11150913 / Sarah Marshall   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is
likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15850  Respondent: 11150913 / Sarah Marshall  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.
There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15848  Respondent: 11150913 / Sarah Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students I live accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university’s ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15849  Respondent: 11150913 / Sarah Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15853  Respondent: 11150913 / Sarah Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations were available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<thead>
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<th>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</th>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)</td>
</tr>
<tr>
<td>Our villages are already suffering from severe congestion for much of the day, for example the Newark Road &amp; Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.</td>
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<tr>
<td>Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.</td>
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<td>I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.</td>
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<tr>
<td>Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.</td>
</tr>
<tr>
<td>With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.</td>
</tr>
<tr>
<td>The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.</td>
</tr>
<tr>
<td>The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.</td>
</tr>
<tr>
<td>This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.</td>
</tr>
<tr>
<td>The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.</td>
</tr>
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</table>
| Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to
court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15846  Respondent: 11150913 / Sarah Marshall  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 &
M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15847  Respondent: 11150913 / Sarah Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15839  Respondent: 11150913 / Sarah Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The
fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.
There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/15840  **Respondent:** 11150913 / Sarah Marshall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/15837  **Respondent:** 11150913 / Sarah Marshall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15838  Respondent: 11150913 / Sarah Marshall  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guilford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

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The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brownfield sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1754  Respondent: 11150913 / Sarah Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

2. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set.

Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1755  Respondent: 11150913 / Sarah Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/1756  **Respondent:** 11150913 / Sarah Marshall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites-which amount to 65% of the proposed housing number.
5. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the proposal to develop land at Garlicks Arch (Policy A43). The proposed development of industrial and commercial sites would significantly increase the volume of traffic through Send Village to and from the Waking area and beyond. Send Road already carries a high volume of traffic heading to and from the A3 and M25 which causes serious congestion at peak times in particular. The road infrastructure in the village simply could not sustain a further significant increase in traffic.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7482  Respondent: 11151009 / Maggie Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the proposed A3 interchange at Burnt Common (Policy A43A) for the same reason as above. The road through Send would become an artery for the A3 traffic and the effect on the nature and character of the village would be disastrous.

I should be grateful if you would ensure that my comments are brought to the attention of the Planning Inspector who will review and decide on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7480  Respondent: 11151009 / Maggie Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A44 (Land west of Winds Ridge and Send Hill). This policy proposes 40 new dwellings and two travellers' pitches on a site which has not been included in previous versions of the Draft Plan. Send Hill is a narrow road running between the village and Potters Lane and provides the only access to the village. The southern end of the road is very narrow and residents routinely park on both sides of the road. Even with the existing traffic access can be difficult at any time of the day. The addition of vehicles connected with the proposed 40 new dwellings will significantly worsen the situation. Beyond Winds Ridge and the cemetery the road narrows yet further and becomes a twisting, single carriageway road with passing places and joins Potters Lane on a blind corner. The road is not suitable for the increased traffic which would be generated by the new development and is absolutely unsuited to large vehicles such as travellers' caravans and trailers.

1. Furthermore I object to Policy A44 (Land west of Winds Ridge and Send Hill) as the subsoil of the proposed site contains documented unsafe landfill and is thus unsuitable for development.
1. I object to the proposal in Policy A44 to include two travellers' pitches in this development. Policy HI (Homes for All) states that traveller accommodation should be included on development sites of 500 homes or more and two pitches should be provided in developments of 500 to 999 homes. Furthermore in the Reasoned Justification for Policy HI it states that "We require traveller accommodation within development sites of 500 homes or more to help create sustainable, mixed communities with suitable housing for all" (4.2.24). It is contrary to this policy therefore to propose two pitches on a development of just 40 houses and I have seen no rationale for deviation from the stated policy. Furthermore Policy HI states that traveller sites must have "safe vehicular access". For reasons stated above access to and egress from the proposed development site onto the narrow Send Hill would not be safe for travellers' vehicles or for other road users affected by their manoeuvring. I understand the requirement to provide pitches for travellers but I suggest that more appropriate sites could be designated closer to the A3 allowing easy and safe access and egress whilst maintaining a similar distance from schools, medical services and shops. I can see no logical reason for placing travellers' sites in such an inaccessible location as the land off Send Hill.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16649  Respondent: 11151009 / Maggie Smith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy P2 under which areas of land surrounding Send Village would be taken out of the Green Belt. The Green Belt around Send provides a buffer between Guildford and Woking in accordance with Government Policy to limit urban sprawl and the reduction of the Green Belt in this strategic area would be the first step in the development of the very urban spread which the Green Belt was devised to prevent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1836  Respondent: 11151009 / Maggie Smith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Objections to Proposed Submission Local Plan

I object to certain policies set out in the Proposed Submission Local Plan which pertain in particular to Send and the surrounding area, as follows:

1. I object to the fact that a number of the policies included in the Proposed Submission Local Plan have not been raised for prior consultation and were not included in the Regulation 18 draft, in particular Policies A43, A43A and These policies have not been included in previous drafts of the plan which were subject to full consultation, and I object to the fact that these significant development proposals have been introduced for the first time in this final version of the plan and there has been no opportunity for residents to comment on them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/505  Respondent: 11151617 / Nigel Tallick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for it’s removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance.

The Plan states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch.

The site is not appropriate because:

- There is no sustainable transport infrastructure.
- The site is liable to frequent flooding
- The site has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.
- There are no plans to improve local schools, medical or utilities to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/504  Respondent: 11151617 / Nigel Tallick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

North facing ramps to the A3 at Burnt Common would be a disaster for local communities, which do need to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. E.g. all traffic from London/M25 to Woking would go through Burnt Common, Send and Old Woking. This is not sustainable as this cannot be improved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1129  Respondent: 11151617 / Nigel Tallick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1131  Respondent: 11151617 / Nigel Tallick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/1126   Respondent: 11151617 / Nigel Tallick   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy II)

There is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that.

The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses means dangerous and unsustainable traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1132   Respondent: 11151617 / Nigel Tallick   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the lack of proper infrastructure planning for sites (Policy II)

The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. I object to poor air quality concerns (Policy I3)

The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1127  Respondent:  11151617 / Nigel Tallick  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1124  Respondent:  11151617 / Nigel Tallick  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick’s Arch.

The development should be in urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1128  Respondent: 11151617 / Nigel Tallick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7972  Respondent: 11151745 / Nigel Thomas  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I write to state that I strongly object to the above proposals. This land contributes to the open character of Shalford Village and provides an attractive setting for the village's community facilities. Highly significant is that access to this land is via Chinthurst Lane which is an already heavily congested country lane!

As a Shalford resident since 1969 I urge you to withdraw these proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2520  Respondent: 11151969 / A. Neilson  Agent: Harriet Richardson

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1 INTRODUCTION

1.1 This planning appraisal has been carried out by Batcheller Monkhouse on behalf of Mr and Mrs Neilson, to provide an up to date site assessment of land at Oakland Farm, Green Lane, Ockham Road North, West Horsley in the context of the Guildford Borough Proposed Submission Local Plan.

1.2 The land at Oakland Farm has been identified for allocation in the Guildford Proposed Submission Local Plan as part of a wider site referred to as Land to the North of West Horsley, under policy A40. The purpose of this report is to address why this proposed allocation site should continue to be included in the final version of the Local Plan and why the site should be removed from the Green Belt.

1.3 This document provides a brief description of the site, designations and restrictions, a brief review of key considerations raised in the Proposed Submission Local Plan and an assessment of the contribution to the purposes of the Green Belt. The previous representations which were submitted to the Council in March also included an assessment of the site in relation to competing sites also identified as housing allocations in the Draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 20160715_Oakland_Farm_reps_to_Submission_Local_Plan_HRCJT_FINAL (1).pdf (574 KB)

Comment ID: PSLPS16/5230  Respondent: 11151969 / A. Neilson  Agent: Harriet Richardson

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A40

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
SITE AND SURROUNDINGS

Figure 1: Site location Source: Google maps

2.1 Figure 1 shows the area of land owned by Mr and Mrs Neilson outlined in yellow. The land has been promoted as part of a wider development site which is outlined in red has been identified as a housing allocation for circa 120 units in the Proposed Submission Local Plan and is referred to as Land to the North of West Horsley, under policy A40.

2.2 A substantial part of the wider development site is owned by a developer in the form of Persimmon Homes. We have been in discussions with Persimmon Homes relating to the inclusion of their land within the allocation and there is a will on all sides to collaborate if that represents the best outcome for addressing the broader housing needs of the

2.3 The land to the west of the proposed allocation is heavily wooded and this mature landscape boundary is an important feature in containing the site from future sprawl. The woodland to the west of the proposed allocation might be too small to be used as formal SANGS land, however it could be made available to the public to assist with offsetting the perceived impact development may have on the Thames Basin SPA. It should therefore also be included as part of the allocation. There is a permissive path adjoining the woodland.

2.4 To the south west of the site is a lake, with housing development to the south eastern, eastern and northern boundaries. Mr and Mrs Neilson’s land parcel, and the wider site is therefore well contained both physically and visually.

2.5 The land currently lies within the Green Belt and adjoins the village of West Horsley (North). The site, along with all of the other proposed West Horsley allocation sites in the Proposed Submission Local Plan are within 400m to 5km of the Thames Basin Heaths SPA. The Proposed Submission Local Plan however states that Suitable Alternative Natural Green Space (SANGS) is likely to be available in the area.

2.6 The latest survey carried out by West Horsley Parish Council identified a local tolerance of up to 75 new dwellings in the village within the Local Plan. Assuming the entire proposed allocation site at Oakland Farm can be built out, it has the potential capacity for circa 120 units and therefore it could easily provide the required housing numbers within a single, self-contained site.

2.7 There is no relevant planning history for Mr and Mrs Neilson’s part of the identified allocation site beyond a certificate of lawful use or development for a small extension to an existing pool house. This does not affect the area being promoted for development.

2.8 The proposed allocation site has since been assessed as being Suitable, Available and Achievable in the SHLAA June 2014, Ref: 975, 2027, 1. It was also identified in the Proposed Submission Local Plan as a site allocation for new homes and was identified as a potential development area within the Green Belt and Countryside Study (GBCS) Ref: C14-A.

KEY CONSIDERATIONS

The Proposed Submission Local Plan document sets out the site in Policy A40. It identifies the key considerations as:

- Flood risk
- Surface water flood risk
- Access

FLOOD RISK

3.1 The Environmental Agency flood mapping identifies part of the overall site as being within Flood Zones 2 and 3, however only the very north east tip of Mr and Mrs Neilson’s land (being the position of the existing residential dwelling) is shown as being within Flood Zone 2 or 3.
3.2 Persimmon have however carried out their own flood modelling of the site and surrounding area and the results confirm that neither the site nor the access roads are within Flood Zone 2 or Figure 2 below shows the flood modelling carried out by Persimmon which clearly demonstrated that there is no flood risk to the site or the access roads:

Figure 2: Persimmon Flood Modelling

3.3 Persimmon have confirmed that their own flood risk assessments stipulates:

‘flood risk as previously identified by the Environment Agency is not as was initially thought. Capita has rated the site as a ‘4’ with regards to flood risk suitability. This score means that the site is of less concern with regards to flooding. The conclusions reached by Capita as part of this SFRA was that “area to the north east of the site is shown to be within the Flood Zone 3. Should development be avoided in these areas, and appropriate SuDS developed on site…..it is likely that the site could pass the technical part of the Exception Test”. The surrounding area of the site is predominately in Flood Zone 1 as identified by Capita therefore there is little or no flood risk with this.

In addition to the work undertaken by Capita, Persimmon has carried out its own detailed flood modelling for the site and the immediate surrounding area. This modelling was carried out on a worst case scenario and the outcome of this was that under this scenario, Ockham Road North and importantly the access into the site remains dry and is not subject to flooding. The modelling work also incorporated climate change allowances in line with newly released Environment Agency/DCLG guidance. This detailed modelling has clearly shown the Environment Agency’s mapped flood extents to be overestimating the actual scenario and further advances Capita’s assessments. Therefore, Persimmon are of the opinion that the unreliability of the Environment Agency data should not be used further and that the more detailed and up-to-date, site-specific modelling carried out as part of our assessments should be relied upon.’

3.4 The flood risk has been addressed through Persimmon’s flood risk modelling and assessment which will be submitted as part of their representations for the wider site.

3.5 It should be highlighted that Mr & Mrs Neilson’s land could be brought forward independently in any event as a stand-alone site.

ACCESS

3.6 Access was also identified as a key considerat Access is however not a risk to the deliverability of Mr and Mrs Neilson’s site as there are two existing vehicular access points that could serve the land parcel. The first is controlled by Mr and Mrs Neilson, and is the access off Green Lane which currently serves Oakland Farm. It should be noted that whilst Green Lane itself is a relatively narrow road, the Highways boundary extends significantly beyond the existing line of tarmac, and can easily be widened. All necessary upgrades would be made to the road, regarding widening and improving its surface, as well as the junction with Ockham Road North. The second is an existing vehicular right of way across the track running west off Ockham Road North, which is being proposed by Persimmon as the principal access to their site. Mr and Mrs Neilson’s land could therefore be accessed without the need for any land acquisition and is deliverable with or without the development of the wider allocation site.

3.7 The site is also well connected on foot, with a permissive path running adjacent to the west of the subject woodland, around the camp site, to Bens Wo This woodland is understood to have been planted in 2001 as a public amenity, with funding through the EU and DEFRA through the Countryside Stewardship Scheme. Further, there are extensive footpaths via Whitehall Lane, which is at the junction of Green Lane and Ockham Road North, being only some 250 yards from the property.

3.8 The site at Oakland Farm is also within walking distance to the station and both the Raleigh School and Glenesk Pre Prep. In addition it is located within close proximity to the nearest accessible natural and semi-natural greenspace, as identified in the East Horsley and West Horsley (North) Sustainability Assessment Walking Distance The site is located one mile away from the centre of East Horsley where much of the local facilities which can serve residents’ day-to-day needs are found. These facilities include a number of local shops, including a Budgens convenience store, a newsagents, post office, pharmacy and bank. The village hall lies to the rear of these shops and is easily accessible from the main high street. The main line rail station is also located close to the high street and this allows access to London Waterloo via a direct train which takes under an hour and includes stops at larger stations such as Leatherhead, Epsom, Wimbledon and Clapham Junction allowing access to large employment areas and facilitating onward travel.
3.9 The settlement hierarchy, published in May 2014 and used as part of the evidence base for the emerging Local Plan, notes that East Horsley has a population of 3,785 (2011) and is ranked as the 3rd most sustainable location within the borough (out of 32). In addition to the highly rated sustainability of East Horsley, the site lies close to West Horsley which is ranked as the 13th most sustainable location within the borough (out of 32).

4 GREEN BELT

4.1 The final key restriction regarding the development of the proposed allocation site at Oakland Farm is its Green Belt West Horsley is a medium sized village which was identified in the Local Plan Strategy Issues and Options to be removed from the Green Belt. The proposed allocation site is completely enclosed and as such the risk of future development sprawl is minimal.

4.2 There are 5 purposes to the Green Belt which have been set out below in relation to this proposed allocation site:

To check the unrestricted sprawl of large built-up areas

4.3 The proposed allocation site adjoins the medium sized village of West Horsley which is not considered to be a large built up To the north, east and south east of the site is existing residential development. To the west and south is a mature tree belt and lake, forming natural barriers to future development sprawl. It is therefore considered that this site is not required to be in the Green Belt in order to prevent the village from sprawling.

To prevent neighbouring towns merging into one another

4.4 The nearest other settlement to the site is Ockham, some 1.25km away. West Horsley is currently detached from Ockham by Green Lane which runs along the north of the site, as well as a further 25km of open countryside and farms. To the west is Send Marsh, separated by 6.5km of open countryside as well as the A3 and further smaller roads. It is therefore the case that development of the proposed, well contained site, could have little if any impact in respect of the merging of neighbouring towns and there is therefore no necessity for the site to remain within the designation to support that aim.

To assist in safeguarding the countryside from encroachment

4.5 As set out in the two points above, the site is surrounded by existing residential development and a strip of mature woodland. Development of the site would therefore fill a gap in the pattern of existing residential development and would not encroach into the open countryside.

To preserve the setting and special character of historic towns

4.6 West Horsley is not considered to have any special or historic character. Paragraph 86 of the NPPF states that if the character of the village needs to be protected for reasons beyond its contribution to the openness of the Green Belt, ‘other means should be used, such as Conservation Area or normal development management policies, and the village should be excluded from the Green Belt.’ This section of the village is not considered to contribute significantly to the openness of the Green Belt and as such it should be excluded.

To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

4.7 The West Surrey SHMA found that the objectively assessed need was 1,729 homes per annum for the region between 2013 and 2033, 693 of which are to be provided within the Guildford local planning area per annum. It is therefore necessary for the Local Planning Authority to consider a range of sites, both brownfield and green. Of course brownfield sites should be developed first, however the Council has recognised that the existing available brown field sites within the area are not sufficient to meet current housing requirements. There is therefore a clear indication that the Council will need to identify Greenfield land, much of which will be Green Belt if it is to meet housing requirements. On this basis there is a strong case for this identified site to be removed from the Green Belt to allow for beneficial development.

4.8 The proposed allocation site was identified in the SHLAA 2014 as having development potential for circa 114 flats or houses on the basis of a density of 14 dp It was identified in the Proposed Submission Local Plan as an allocation site for approximately 120 dwellings.
5 CONCLUSION

5.1 This planning appraisal has been carried out by the professional planning team at Batcheller Monkhouse on behalf of Mr and Mrs Neilson, regarding the land at Oakland Farm, Green Lane, Ockham Road North, West Horsley, to be submitted as formal representations to the Proposed Submission Local Plan Consultation.

5.2 The land at Oakland Farm has been identified as part of a wider site for allocation in the Guildford Proposed Submission Local Plan (policy A40), much of which is owned by Persimmon. The Proposed Submission Local Plan raises key considerations for the site which include flood risk and access. It is considered that both these matters have been addressed in this planning appraisal, with reference made to an independent flood risk assessment and flood modelling commissioned by Persimmon, and confirmation that the vehicular access is already secure. The owners of Oakland Farm are in ongoing discussions with Persimmon, as well as a number of other builders who are keen and willing to develop Oakland Farm.

5.3 This appraisal considers the site in the context of the 5 purposes of the Green Belt and finds that it makes no contribution to the openness of the Green Belt, nor does it contribute to the purposes of including land within the des. The land should therefore remain as an allocation in the final version of the Local Plan and should be removed from the Green Belt as has been proposed. The site would provide a range of good quality houses within the next 1-5 years in a suitable location with minimal visual impact. There is minimal risk of outward expansion of the site in the future, and the site is capable of providing the full housing requirement for West Horsley.

5.4 It is therefore considered that this land is the preferred allocation site for the village and should remain as such moving forward to the final version of the Local Plan. The owners will continue to promote the site for residential development in the immediate term and have substantial developer interest.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 2016-07-15 Oakland Farm reps to Submission Local Plan HR-CJT FINAL.pdf (574 KB)

Comment ID: PSLPS16/7741  Respondent: 11151969 / A. Neilson  Agent: Batcheller Wakefield (Caroline Wakefield)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A40

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. INTRODUCTION

1.1 This planning appraisal has been carried out by Batcheller Monkhouse on behalf of Mr and Mrs Neilson, to provide an up to date site assessment of land at Oakland Farm, Green Lane, Ockham Road North, West Horsley in the context of the Guildford Borough Proposed Submission Local Plan.

1.2 The land at Oakland Farm has been identified for allocation in the Guildford Proposed Submission Local Plan as part of a wider site referred to as Land to the North of West Horsley, under policy A40. The purpose of this report is to address why this proposed allocation site should continue to be included in the final version of the Local Plan and why the site should be removed from the Green Belt.
1.3 This document provides a brief description of the site, designations and restrictions, a brief review of key considerations raised in the Proposed Submission Local Plan and an assessment of the contribution to the purposes of the Green Belt. The previous representations which were submitted to the Council in March also included an assessment of the site in relation to competing sites also identified as housing allocations in the Draft Local Plan.

2. SITE AND SURROUNDINGS

2.1 Figure 1 shows the area of land owned by Mr and Mrs Neilson outlined in yellow. The land has been promoted as part of a wider development site which is outlined in red. The wider area outlined in red has been identified as a housing allocation for circa 120 units in the Proposed Submission Local Plan and is referred to as Land to the North of West Horsley, under policy A40.

2.2 A substantial part of the wider development site is owned by a developer in the form of Persimmon Homes. We have been in discussions with Persimmon Homes relating to the inclusion of their land within the allocation and there is a will on all sides to collaborate if that represents the best outcome for addressing the broader housing needs of the borough.

2.3 The land to the west of the proposed allocation is heavily wooded and this mature landscape boundary is an important feature in containing the site from future sprawl. The woodland to the west of the proposed allocation might be too small to be used as formal SANGS land, however it could be made available to the public to assist with offsetting the perceived impact development may have on the Thames Basin SPA. It should therefore also be included as part of the allocation. There is a permissive path adjoining the woodland.

2.4 To the south west of the site is a lake, with housing development to the south eastern, eastern and northern boundaries. Mr and Mrs Neilson’s land parcel, and the wider site is therefore well contained both physically and visually.

2.5 The land currently lies within the Green Belt and adjoins the village of West Horsley (North). The site, along with all of the other proposed West Horsley allocation sites in the Proposed Submission Local Plan are within 400m to 5km of the Thames Basin Heaths SPA. The Proposed Submission Local Plan however states that Suitable Alternative Natural Green Space (SANGS) is likely to be available in the area.

2.6 The latest survey carried out by West Horsley Parish Council identified a local tolerance of up to 75 new dwellings in the village within the Local Plan period. Assuming the entire proposed allocation site at Oakland Farm can be built out, it has the potential capacity for circa 120 units and therefore it could easily provide the required housing numbers within a single, self-contained site.

2.7 There is no relevant planning history for Mr and Mrs Neilson’s part of the identified allocation site beyond a certificate of lawful use or development for a small extension to an existing pool house. This does not affect the area being promoted for development.

2.8 The proposed allocation site has since been assessed as being Suitable, Available and Achievable in the SHLAA June 2014, Ref: 975, 2027, 13. It was also identified in the Proposed Submission Local Plan as a site allocation for new homes and was identified as a potential development area within the Green Belt and Countryside Study (GBCS) Ref: C14-A.

3. KEY CONSIDERATIONS

The Proposed Submission Local Plan document sets out the site in Policy A40. It identifies the key considerations as:

- Flood risk
- Surface water flood risk
- Access

FLOOD RISK

3.1 The Environmental Agency flood mapping identifies part of the overall site as being within Flood Zones 2 and 3, however only the very north east tip of Mr and Mrs Neilson’s land (being the position of the existing residential dwelling) is shown as being within Flood Zone 2 or 3.
3.2 Persimmon have however carried out their own flood modelling of the site and surrounding area and the results confirm that neither the site nor the access roads are within Flood Zone 2 or 3. Figure 2 below shows the flood modelling carried out by Persimmon which clearly demonstrated that there is no flood risk to the site or the access roads:

3.3 Persimmon have confirmed that their own flood risk assessments stipulates:

‘flood risk as previously identified by the Environment Agency is not as was initially thought. Capita has rated the site as a ‘4’ with regards to flood risk suitability. This score means that the site is of less concern with regards to flooding. The conclusions reached by Capita as part of this SFRA was that “area to the north east of the site is shown to be within the Flood Zone 3. Should development be avoided in these areas, and appropriate SuDS developed on site…..it is likely that the site could pass the technical part of the Exception Test”. The surrounding area of the site is predominately in Flood Zone 1 as identified by Capita therefore there is little or no flood risk with this.

In addition to the work undertaken by Capita, Persimmon has carried out its own detailed flood modelling for the site and the immediate surrounding area. This modelling was carried out on a worst case scenario and the outcome of this was that under this scenario, Ockham Road North and importantly the access into the site remains dry and is not subject to flooding. The modelling work also incorporated climate change allowances in line with newly released Environment Agency/DCLG guidance. This detailed modelling has clearly shown the Environment Agency’s mapped flood extents to be overestimating the actual scenario and further advances Capita’s assessments. Therefore, Persimmon are of the opinion that the unreliability of the Environment Agency data should not be used further and that the more detailed and up-to-date, site-specific modelling carried out as part of our assessments should be relied upon.’

3.4 The flood risk has been addressed through Persimmon’s flood risk modelling and assessment which will be submitted as part of their representations for the wider site.

3.5 It should be highlighted that Mr & Mrs Neilson’s land could be brought forward independently in any event as a stand-alone site.

ACCESS

3.6 Access was also identified as a key consideration. Access is however not a risk to the deliverability of Mr and Mrs Neilson’s site as there are two existing vehicular access points that could serve the land parcel. The first is controlled by Mr and Mrs Neilson, and is the access off Green Lane which currently serves Oakland Farm. It should be noted that whilst Green Lane itself is a relatively narrow road, the Highways boundary extends significantly beyond the existing line of tarmac, and can easily be widened. All necessary upgrades would be made to the road, regarding widening and improving its surface, as well as the junction with Ockham Road North. The second is an existing vehicular right of way across the track running west off Ockham Road North, which is being proposed by Persimmon as the principal access to their site. Mr and Mrs Neilson’s land could therefore be accessed without the need for any land acquisition and is deliverable with or without the development of the wider allocation site.

3.7 The site is also well connected on foot, with a permissive path running adjacent to the west of the subject woodland, around the camp site, to Bens Wood. This woodland is understood to have been planted in 2001 as a public amenity, with funding through the EU and DEFRA through the Countryside Stewardship Scheme. Further, there are extensive footpaths via Whitehall Lane, which is at the junction of Green Lane and Ockham Road North, being only some 250 yards from the property.

3.8 The site at Oakland Farm is also within walking distance to the station and both the Raleigh School and Glenesk Pre Prep. In addition it is located within close proximity to the nearest accessible natural and semi-natural greenspace, as identified in the East Horsley and West Horsley (North) Sustainability Assessment Walking Distance Plan. The site is located one mile away from the centre of East Horsley where much of the local facilities which can serve residents’ day-to-day needs are found. These facilities include a number of local shops, including a Budgens convenience store, a newsagents, post office, pharmacy and bank. The village hall lies to the rear of these shops and is easily accessible from the main high street. The main line rail station is also located close to the high street and this allows access to London Waterloo via a direct train which takes under an hour and includes stops at larger stations such as Leatherhead, Epsom, Wimbledon and Clapham Junction allowing access to large employment areas and facilitating onward travel.
3.9 The settlement hierarchy, published in May 2014 and used as part of the evidence base for the emerging Local Plan, notes that East Horsley has a population of 3,785 (2011) and is ranked as the 3rd most sustainable location within the borough (out of 32). In addition to the highly rated sustainability of East Horsley, the site lies close to West Horsley which is ranked as the 13th most sustainable location within the borough (out of 32).

4. GREEN BELT

4.1 The final key restriction regarding the development of the proposed allocation site at Oakland Farm is its Green Belt location. West Horsley is a medium sized village which was identified in the Local Plan Strategy Issues and Options to be removed from the Green Belt. The proposed allocation site is completely enclosed and as such the risk of future development sprawl is minimal.

4.2 There are 5 purposes to the Green Belt which have been set out below in relation to this proposed allocation site.

To check the unrestricted sprawl of large built-up areas

4.3 The proposed allocation site adjoins the medium sized village of West Horsley which is not considered to be a large built up area. To the north, east and south east of the site is existing residential development. To the west and south is a mature tree belt and lake, forming natural barriers to future development sprawl. It is therefore considered that this site is not required to be in the Green Belt in order to prevent the village from sprawling.

To prevent neighbouring towns merging into one another

4.4 The nearest other settlement to the site is Ockham, some 1.25km away. West Horsley is currently detached from Ockham by Green Lane which runs along the north of the site, as well as a further 1.25km of open countryside and farms. To the west is Send Marsh, separated by 6.5km of open countryside as well as the A3 and further smaller roads. It is therefore the case that development of the proposed, well contained site, could have little if any impact in respect of the merging of neighbouring towns and there is therefore no necessity for the site to remain within the designation to support that aim.

To assist in safeguarding the countryside from encroachment

4.5 As set out in the two points above, the site is surrounded by existing residential development and a strip of mature woodland. Development of the site would therefore fill a gap in the pattern of existing residential development and would not encroach into the open countryside.

To preserve the setting and special character of historic towns

4.6 West Horsley is not considered to have any special or historic character. Paragraph 86 of the NPPF states that if the character of the village needs to be protected for reasons beyond its contribution to the openness of the Green Belt, ‘other means should be used, such as Conservation Area or normal development management policies, and the village should be excluded from the Green Belt.’ This section of the village is not considered to contribute significantly to the openness of the Green Belt and as such it should be excluded.

To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

4.7 The West Surrey SHMA found that the objectively assessed need was 1,729 homes per annum for the region between 2013 and 2033, 693 of which are to be provided within the Guildford local planning area per annum. It is therefore necessary for the Local Planning Authority to consider a range of sites, both brownfield and green field. Of course brown field sites should be developed first, however the Council has recognised that the existing available brown field sites within the area are not sufficient to meet current housing requirements. There is therefore a clear indication that the Council will need to identify Greenfield land, much of which will be Green Belt if it is to meet housing requirements. On this basis there is a strong case for this identified site to be removed from the Green Belt to allow for beneficial development.

4.8 The proposed allocation site was identified in the SHLAA 2014 as having development potential for circa 114 flats or houses on the basis of a density of 14 dph. It was identified in the Proposed Submission Local Plan as an allocation site for approximately 120 dwellings.
5. CONCLUSION

5.1 This planning appraisal has been carried out by the professional planning team at Batcheller Monkhouse on behalf of Mr and Mrs Neilson, regarding the land at Oakland Farm, Green Lane, Ockham Road North, West Horsley, to be submitted as formal representations to the Proposed Submission Local Plan Consultation.

5.2 The land at Oakland Farm has been identified as part of a wider site for allocation in the Guildford Proposed Submission Local Plan (policy A40), much of which is owned by Persimmon. The Proposed Submission Local Plan raises key considerations for the site which include flood risk and access. It is considered that both these matters have been addressed in this planning appraisal, with reference made to an independent flood risk assessment and flood modelling commissioned by Persimmon, and confirmation that the vehicular access is already secure. The owners of Oakland Farm are in ongoing discussions with Persimmon, as well as a number of other builders who are keen and willing to develop Oakland Farm.

5.3 This appraisal considers the site in the context of the 5 purposes of the Green Belt and finds that it makes no contribution to the openness of the Green Belt, nor does it contribute to the purposes of including land within the designation. The land should therefore remain as an allocation in the final version of the Local Plan and should be removed from the Green Belt as has been proposed. The site would provide a range of good quality houses within the next 1-5 years in a suitable location with minimal visual impact. There is minimal risk of outward expansion of the site in the future, and the site is capable of providing the full housing requirement for West Horsley.

5.4 It is therefore considered that this land is the preferred allocation site for the village and should remain as such moving forward to the final version of the Local Plan. The owners will continue to promote the site for residential development in the immediate term and have substantial developer interest.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 2016-07-18 GBC re reps HR-CW.pdf (247 KB)
2016-07-15 Oakland Farm reps to Submission Local Plan HR-CJT FINAL.pdf (574 KB)

Comment ID: PSLPS16/2919  Respondent: 11152161 / Alan Sparkes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal in the local plan on the grounds that the site is not large enough to the proposed use.

I object to the proposal int he local plan on the grounds that it would cause adverse impact on street parking.

I object to the proposal in the local plan on the grounds that Send Hill is a single track country road and too narrow to provide sufficient access to the site or accommodate the potential new levels of traffic the proposed development would bring.

I object to the proposal in the local plan on the grounds that send is in green belt. The proposed inset is inappropriate due to its permanent green belt status.
I object to the proposal in the local plan on the grounds that Send Hill is a narrow road result in loss of a turning point for vehicles.

I object to the proposal in the local plan on the grounds that it would impact the nature reserve nearby. The proposed site is a quality green belt amenity area within countryside and would be spoilt by development.

I object to the proposal in the local plan on the grounds that the existing road and parking infrastructure is already inadequate or under pressure and could worsen with the planned development, reducing quality of life.

I object to the proposal in the local plan on the grounds that too many houses are proposed to Send/Send Marsh are and the impact on traffic congestion and local services would be unacceptable.

I object to the proposal in the local plan on the grounds that the proposed number of houses potentially could result in 92 extra cars in Send Hill which is already suffering from congestion particularly at school run time.

I object to the proposal in the local plan on the grounds that this would cause loss of village identity, be detrimental to the community and increased flood risk.

I object to the proposal in the local plan on the grounds that a Wasteland Solutions environmental report on Send Hill dated March 2004 gave evidence of past ponding of water in the excavated area. Further development would disturb water table and increase risk of flooding to my property.

I object to the proposal in the local plan on the grounds that the proposed development site (A44) was used as GBC registered landfill site, not a quarry as listed as reference LLA 2081 in the local plan.

I object to the proposal in the local plan on the grounds that the 1963-8 Ordnance Survey maps of proposed site mark it as "refuse and sag heap". It is therefore unsuitable for such a development on health reasons. I object to the proposal in the local plan on the grounds that the 1971 Ordnance Survey maps of proposed site mark it as "refuse tip" prior to when proper licensing/registration was required. The date of the landfill works predates the 1999 EU landfill Directive regulations. I therefore believe that there is a danger that any disturbance would be health hazard due to the unknown materials.

GBC has installed gas monitoring wells on site since July 2000. One well recording methane gas discharge.

I object to the proposal in the local plan on the grounds that a Southern County Searches (Sitescope Ltd) report E.2978.SN-HCP dated 5 January 2005-Identifies the proposed site as GBC recorded landfill site Ref GU/11/LLC with type of waste not identified. The date of the landfill works predates the 1999 EU Landfill Directive regulations. I therefore believe that there is a danger that any disturbance would be health hazard due to the unknown materials.

I object to the proposal in the local plan on the grounds that a Southern County Searches (Sitescope Ltd) report E.2978.SN-HCP date 5th January 2005-Identifies proposed site GBC recorded landfill site Ref GU/12 with type of waste identified as "unrestricted2. This causes me concern as to what it does contain and dangers if disturbed .

I object to the proposal in the local plan on the grounds that both the Envirosearch Report RS 1100201-1-1 dated 1 h February 2004 and historical map data and information from GBC has identified site as landfill and has "areas of potentially contaminative industrial activities". Development of this site would be a health hazard . The recent news reports of a child dying from seepage of contaminated ground following flooding prove that developing any such sites is a danger to health. The Daily Mail has also recently had an article on how dangers of living near landfill site raises cancer concerns. The paper referenced a study published by the international journey of Epidemiology which tracked 242,000 people living near landfill sites in Italy.

I object to the proposal in the local plan on the grounds that both the Envirosearch Report RS 110001-1-1 dated 17th February 2004 identifies "potential risk from landfill gas migrations"which I believe is a health hazard.

I object to the proposal in the local plan on the grounds that both Envirosearch Report RS 1100201-1-1 dated 17111 February 2004 Concludes "potentially contaminative industrial sites identified from analysis" of Ordnance survey maps.
I object to the proposal in the local plan on the grounds that the Southern County Searches (Sitescope Ltd) report E.2978.SN-HCP dated 5 January 2005 Identifies proposed site as a local authorised landfill site as licences under Part 11 of Environmental protection Act 1990. The proposed site is not a quarry as specified in The GBC Local Plan. Therefore not suitable for the proposed usage.

I object to the proposal in the local plan on the grounds that the Southern County Searches (Sitescope Ltd) report E.2978.SN-HCP dated 5 January 2005 Identifies proposed site as potentially contaminative industrial land. With usage of "Heap and unknown constituents". This causes me concern as to what it does contain and dangers if disturbed.

I object to the proposal in the local plan on the grounds that the Southern County Searches (Sitescope Ltd) report E.2978.SN-HCP 5th January 2005 Identifies changes to proposed site could cause potential ground water vulnerability to my property.

I object to the proposal in the local plan on the grounds that the Traveller Accommodation Assessment research, purported to have been undertaken in June-July 2012 by Mill Field Services, cannot be so. The Sittingbourne based market research company was dissolved in January 2011 according to the government companies site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The overprovision of housing in the Plan which will lead to highway congestion together with excessive strain on the infrastructure including the RSCH and other medical and educational facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11847  Respondent: 11153313 / Milena Nicholas  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

The proposal to increase the size of village boundaries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11846  Respondent: 11153313 / Milena Nicholas  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

The removal of land and villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Pirbright Barracks
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This letter and the accompanying completed consultation questionnaire and comments form comprises the formal written submissions made on behalf of our client, The National Rifle Association (NRA), in response to the content of the Council’s Proposed Submission Local Plan: strategy and sites (herein referred to as LP1).

Before responding further on LP1 however, we would take this opportunity to once again provide the Council with some general background about our client, the NRA and the Bisley Camp itself. We trust this will provide helpful context to the comments made in this response.

General Background

As set out in the NRA’s response to the Draft Local Plan (the DLP) in September 2014, Bisley Camp comprises an overall area of 79ha. The Camp is the internationally recognised home of world target shooting, owned and operated by the NRA. The NRA is a registered charity with a Royal Charter and serves 30,000 target shooting members and affiliates in the UK. The facilities on Bisley Camp serve the largest range complex in Europe that includes 11 rifle ranges providing targets at distances of up to 1,200 yards, and the UK’s finest and largest clay pigeon shooting complex. Camp facilities include retail premises; visitor and staff accommodation; club houses and catering outlets; storage, service, production and office buildings; museum and armouries.

Bisley Camp hosts a year-round programme of competitions and events that each attract up to 2,500 competitors including many from overseas. The Camp is also the home of the other two major UK target shooting organisations, the Clay Pigeon Shooting Association and National Small Bore Shooting Association; and the ranges are extensively used for training by the armed forces, the police and other organisations.

Shooting is a major sport in the UK with over 600,000 regular participants contributing £2 billion to the UK economy (GVA); Bisley Camp is by far the largest target shooting complex in Europe and has the highest profile and richest history in the eyes of the international shooting community - most shooters have heard of “Bisley”, many aspire to visit Bisley, and tens of thousands shoot at Bisley every year.

Conclusions

The NRA are disappointed by the failure to identify and include the developed area at Bisley Camp as a major previously developed site and thereafter for the developed area to be removed from the Green Belt. Whilst in the earlier DLP Bisley Camp was proposed to remain within the Green Belt it had correctly been identified as a major previously developed site. The NRA therefore consider that LP1 no longer provides the same recognition and support for Bisley Camp and this in turn is to the detriment of the NRA’s own interests and that of the Borough’s.

The NRA are also concerned by the omission within LP1 of the former site specific policy allocation (Policy 83) that was proposed as part of the DLP. This appears to be to the further detriment of the NRA’s existing and future reasonable aspirations to preserve and enhance the facilities on offer. Within the emerging new local plan the NRA consider there remains the need to specifically support the NRA and Bisley Camp as a whole as a significant local employer, tourist, leisure and recreational provider and a nationally (and internationally) recognised facility.

The NRA acknowledge that Bisley Camp must continue to be correctly governed by appropriate national and local plan policies. However, it is considered the apparent failure to acknowledge the developed area of Bisley Camp as a major developed site and the subsequent retention of the site within the Green Belt will result in unnecessary policy restraints in addition to other development management policies that can sufficiently be used to restrict any inappropriate development from taking place, i.e. heritage and conservation protection, biodiversity and ecology protection policies, etc.
On behalf of the NRA we therefore respectfully request the comments made in this written submission be fully taken into account and appropriate supportive amendments be made before the Submission of the new local plan is undertaken.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/18618  **Respondent:** 11154881 / National Rifle Association (A Mercer)  **Agent:** Andy Stallan (WYG)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Key facts

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Section 2: Key Facts about the Borough**

The NRA have no concern with the current content of paragraphs 2.1 – 2.35 per se. However, aside from the single reference made within paragraph 2.8 that ‘The tourism and service sectors, commercial services and manufacturing industries are also significant employers in the borough’ there is no recognition of the Borough’s leisure and visitor experience and the significant contribution this makes. Indeed, it is not until Section 4 of LP1 that the leisure and visitor experience is given substantive reference wherein paragraph 4.4.53 sets out the leisure and visitor experience is one of the fastest growing industries in the Borough which makes a significant contribution to Guildford’s economy. Indeed tourism alone is referred to generating over £330 million of income for local businesses and supporting more than 6,000 jobs (in 2014).

The NRA, being a provider and contributor to the Borough’s leisure and visitor experience would encourage greater recognition of the overall leisure and tourism industry within LP1 and for this to be rightly presented within Section 2 of the Plan and its establishment of key facts about the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/18621  **Respondent:** 11154881 / National Rifle Association (A Mercer)  **Agent:** Andy Stallan (WYG)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Section 4.4: Economy Policies: Policy E5

The NRA endorse the inclusion within the first bullet point of Policy E5 the clear statement that to promote a strong rural economy the sustainable growth and expansion of all types of business and enterprise in rural areas will be supported through conversion of existing buildings and provision of well-designed new buildings of appropriate scale, provided they are in accordance with green belt policies and other policies in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Section 4.4: Economy Policies: Policy E6: The leisure and visitor experience

The NRA are pleased to see paragraphs 4.4.53 – 4.4.56 provide a summary of the role and contribution that the leisure and visitor experience provides to the quality of life, social and cultural wellbeing of the Borough. The sectors contribution and value to the Borough’s economy is also rightly noted within the text.

The NRA would be pleased if within paragraph 4.4.55 the Council wished to refer to the Bisley Camp and the NRA as another of the Borough’s named recreational and tourism attractions and leisure opportunity.

The NRA consider the wording of Policy E6 is correctly supportive for the Borough’s future leisure and visitor experience and is pleased to see the provision of new and enhanced leisure and visitor attractions and the provision of new and improved accommodation and conference facilities for tourist and business visitors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/18620</th>
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<th>Agent: Andy Stallan (WYG)</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Section 4.3: Protecting Policies; Policy P2: Green Belt

The NRA note paragraph 4.3.11 reflects the NPPF in stating that the main aim of Green Belt is to prevent urban sprawl by keeping land permanently open.

Paragraph 4.3.12 states that historically all the villages in the Borough, except Ash Green, and major previously developed sites have been washed over by the Green Belt designation. The text then correctly confirms that the NPPF states that only those villages whose open character makes an important contribution to the openness of the Green Belt should be included within it. Those that do not should be inset, or removed, from it and other development management policies used to restrict any inappropriate development.

Paragraph 4.3.13 provides a list of villages which under LP1 will now be inset from the Green Belt.

Paragraph 4.3.14 follows and clearly states that although not villages, a similar approach is to be applied to major previously developed sites in relation to whether they should remain washed over or be inset from the Green Belt. Again the paragraph correctly reiterates that the NPPF requires that land which it is unnecessary to keep permanently open should not be included in the Green Belt. If major previously developed sites are of sufficient scale and do not possess an open character, it is not considered necessary for them to remain within the Green Belt.

Paragraph 4.3.15 goes on to list the major previously developed sites (MPDS) which will become inset from the Green Belt under LP1. These are: Henley Business Park, HM Prison Send, Keogh Barracks, Mount Browne, Pirbright Barracks, Pirbright Institute and the University of Law Guildford.

The NRA do not object to the insetting of any of these MPDS from the Green Belt. However, the NRA are entirely concerned, and disappointed, by: 1) the omission of Bisley Camp from the list of major previously developed sites within the Borough set out by paragraph 4.3.15; and 2) the according omission of Bisley Camp's developed land area as being inset from the Green Belt and shown to be so on the proposals maps of LP1.

As the Council will recall, in response to the consultation on the DLP in late 2014 the NRA submitted representations on the findings of the Council’s Green Belt and Countryside Study (GBCS) which comprised, and still does, part of the evidence base upon which the new local plan and its policies are being developed. It is not our intention to fully reiterate the content of the representations made in response to the DLP in response to LP1. A copy of the complete submission is however included at Appendix 1 of this submission for ease of reference and we invite the Council to review it again as a comprehensive element of the NRA’s submission to LP1, specifically in regard to the content under the section heading ‘Assessment of the Evidence Base’.

As currently written, whether by intention or otherwise, the NRA are concerned that between the consultation on the DLP and the potential, and correct, status of the developed area of Bisley Camp as a MPDS has now been withdrawn by LP1. This is sincerely disappointing given the comparable similarities identified for the Council within the NPPF’s representation made in response to the DLP, specifically regarding the developed area of Bisley Camp and Henley Business Park and The University of Law. The NRA consider that the status of these sites as MPDS support the basis for recognising and establishing Bisley Camp as a MPDS within LP1; and equally for Bisley Camp to be removed from the Green Belt also.

Accordingly, the NRA would like to see paragraph 4.3.15 amended to include Bisley Camp as a specified major previously developed site. The NRA also consider that the boundary of Bisley Camp’s MPDS should be shown on the LP1 proposal maps to the extent shown on the drawing attached as Appendix 2 of this letter.

The NRA also note that beyond the reference to MPDS within paragraph 4.3.15 LP1 does not contain any other policy concerning MPDS. Having spoken with members of the Council’s Policy Team we have been advised that, at this time, it is the intention that a specific policy or set of policies relating to MPDS’s will be brought forward as part of the future Local Plan 2: Development Management Policies (LP2). It is considered this approach is less than ideal for the NRA and Bisley Camp. Firstly, although a MPDS policy could conceivably be delivered via the LP2 given the purpose and intent of MPDS status and its implications it is considered that this matter should be addressed as part of the LP1. MPDS are strategic policy designations and their designation and policy context should be developed and assessed accordingly. Indeed, as currently written in LP1 it would appear that this is what the consequence of paragraph 4.3.15 and the proposals maps are already establishing. The omission of Bisley Camp as an inset MPDS within LP1 is therefore failing to support the future regeneration and potential sustainable growth of the camp as a significant contributor to the leisure and tourism industry.
within the Borough. This would be contrary to paragraph 28 of the NPPF and likewise to the Council’s own stated spatial vision.

The NRA would also acknowledge the Council’s current LDS sets out the timescale for delivery of LP2 which is due to commence with evidence gathering from September 2017. Final adoption of LP2 will subsequently follow, after intervening consultation stages, in late 2018/early 2019. LP2 is clearly someway from the present and this further increases the importance to the NRA of the appropriateness to define the status of Bisley Camp as a MPDS (whether within or inset from the Green Belt) as part of LP1.

In summary conclusion, the NRA consider Bisley Camp should be allocated as an inset major previously developed site. Insetting the site would not conflict with the purposes of including land within the Green Belt (as defined by Paragraph 80 of the NPPF) and, on balance, there is no reason why sufficient defensible boundaries (in compliance with Paragraph 85 of the NPPF) should not be identified. In this regard the NRA would welcome further dialogue with Officers of the Policy Team to discuss and provide additional boundary information. Furthermore, as identified in paragraph 20.8 of the GBCS, if major previously developed sites are not considered appropriate for insetting and are to remain washed over within the Green Belt this implies the open character of the site makes an important contribution to openness. This in turn implies there is limited opportunity to redevelop, or expand the site, without detracting from the openness of the Green Belt. It is evident from an objective assessment of the major developed area at Bisley Camp that the land does not make such an important contribution to the openness of the Green Belt nor does it in landscape character terms as identified in the Council’s own Landscape Character Appraisals. It is also evident that Bisley Camp exhibits comparable features with other major previously developed sites in the Borough that are proposed to be inset from the Green Belt and are stated as such within paragraph 4.3.15 of LP1.

**Policy P2: Green Belt**

The NRA generally support the wording of Policy P2.

However, the 4th bullet point of paragraph 89 of the NPPF clearly states the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces is one of the stated exceptions whereby the construction of a new building need not be considered inappropriate. Nowhere within the NPPF is it stated or implied that new buildings must also be sited on or close to the position of the existing building.

The inclusion of this requirement within Policy P2 is therefore entirely unnecessary, unduly restrictive and fails to accord with the corresponding Green Belt policies of the NPPF. The inclusion of this requirement within Policy P2 is also unqualified within the supporting text to justify why such a specific additional policy requirement should be included within the Borough’s development plan.

The NRA would therefore support an amendment to Policy P2 so that it reads:

‘…Proposals will be permitted where they are consistent with the exceptions listed in national planning policy and, where relevant, also meet the following criteria:…

**Replacement buildings**

The replacement of a building, provided the new building:

- Would be in the same use, and
- Is not materially larger than the one it replaces.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:  
- Appendix 2 GBCS Section 20 Extract (2).pdf (479 KB)
- Appendix 1 BISLEY CAMP MPD (2).pdf (2.2 MB)
- 160713 LP1 Representation on behalf of the NRA DRAFT (002) (2).pdf (287 KB)
Policy S1: Presumption in Favour of Sustainable Development

The NRA support the presumption in favour of sustainable development and the commitment to work proactively with applicants to jointly find solutions that mean that proposals can be approved wherever possible; and to secure development that improves the economic, social and environmental conditions in the area. This approach being compliant with the National Planning Policy Framework (NPPF).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Refer to the accompanying separate representation submission letter dated 15th July 2016 for details.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 160713 LPI Representation on behalf of the NRA DRAFT (002) (2).pdf (287 KB)

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Comment ID: SQLP16/2018  Respondent: 11154881 / National Rifle Association (A Mercer)  Agent: WYG (S Crickett)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Bisley Camp is the internationally recognised body/home of world target shooting and the NRA is a registered charity with a Royal Charter and serves 30,000 target shooting members and affiliates in the UK. The NRA wish to express an interest in participating at the Examination in recognition of the importance that the policies of the new local plan will have upon the interests of the NRA specific to the continued success and appropriate potential future improvements of the facilities at Bisley. The importance of the leisure and visitor experience and the significant contribution this sector makes to the Borough's economy should be reflected as part of the Local Plan process. The NRA wish to contribute and engage directly as one provider of a leisure and tourism attraction within the Borough accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2729  Respondent: 11155713 / Andrew Bandosz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

RE: REGULATION 19 CONSULTATION, DRAFT LOCAL PLAN POLICY A29

I write on behalf of Copperwood Developments Ltd, to make specific comments relating to draft Policy A29.

As background information, Copperwood Developments Ltd recently obtained Outline planning consent at appeal for 56 dwellings on Land South of Guildford Road, Ash (Application Ref 14/P/01870).

Following the appeal decision (APP/Y3615/W/15/3135326), dated April 2016, Copperwood submitted a further Outline planning application for 154 dwellings on an enlarged application site (Application Ref 16/P/01679). This application was recommended for approval to the Planning Committee (17th May 2017), who resolved to approve the scheme subject to a
S.106 agreement, which included a requirement for land to be made available for the Ash road bridge as well as a contribution towards the road bridge itself.

[Location Plan for outline application 16/P/01679(154 dwellings]

It should be noted, that as part of the planning application the applicant’s Highway Consultant submitted extensive reports and data to Surrey County Highways Authority (SCHA) to demonstrate that the proposal for 154 dwellings, on its own, and in combination with other development schemes in the area, would not generate a requirement for a road bridge.

The submitted transport assessment has been accepted by SCHA, who have confirmed that a road bridge is not required as part of my client’s proposal. However, Guildford Borough Council (GBC) continue to insist that a road bridge is required and refers to the emerging Policy A29. The Committee Report, whilst referring to Policy A29 and the S106 road bridge contribution, nevertheless states that the policy carries limited weight at this stage due to its draft status.

My client contends that the requirement for a financial contribution for the road bridge and for my client to gift land to the GBC for the road bridge, fails to meet the tests for S.106 agreements, namely that the requirement is necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.

Turning to Policy A29, I would make the following comments:

Policy A29 (1)
We note the requirement for a financial contribution towards expansion of Ash Manor Secondary School for an additional one form entry. It is not clear how these contributions will be sought, and from which developments, particularly as CIL Regulations only enable the Council to seek a maximum of 5 x S106 agreements for a specific infrastructure project.

The policy does not elaborate as to which of the planned development schemes, numbering 1,750 dwellings in total, will contribute towards the secondary school, particularly as some 40% of the 1,750 dwellings have already obtained planning consent without any contributions being payable towards the school.

It is contended, that funding for the secondary school would be more appropriate and equitable through CIL contributions, once the charging schedule is in place.

Policy A29 (2)
It is contended, that seeking financial contributions towards the expansion of existing GP provision in the area, through land and new buildings for a new GPs surgery, is a questionable infrastructure project, particularly as doctors surgeries tend to be privately owned enterprises, owned often by the practice doctors and not owned by NHS England. The contributions towards a doctors surgery could, therefore, be potentially funding a private enterprise.

As noted in the Member and officer discussion during the consideration of application 16/P/01679 (May 2017 Planning Committee), the Council officer responding to a question by a Councillor concerning contributions towards a GP surgery stated:-

“...we are trying to engage with GPs and CCGs but at the moment we don’t have a costed and worked up project by which to take a contribution to.” ”...the Bewley Homes Scheme for 400 secures land for provision of a healthcare facility. If we knew what that was and we knew NHS England were going to fund it and pay for it we could seek contributions towards it. Where we are at the moment is we don’t know who will fund that or provide that. That could be provided privately for a commercial rent and if you take a contribution to it you are funding a private company to deliver something that they are providing. We don’t have enough information on what that project is at this time to be able to justify a contribution towards it. “. “...The answer to that question I think is we don’t have the evidence and there’s not the evidence before you in this committee to link this development to causing an unacceptable impact on local healthcare provision. I appreciate there’s lots of developments that have gone before and anecdotal evidence of GPs’ waiting times is before everybody but to be able to justify reason for refusal you would have to be able to link this development to that breaking point in healthcare provision in the area and we don’t have that evidence. Thank you Chairman”

In the light of the above officer comments to the Planning Committee Members in May of this year, it is somewhat surprising that this Policy (A29 (2)) continues to seek such contributions.
Policy A29 (9)
The policy seeks provision of a new road bridge and associated footbridge to enable the closure of the level crossing. There is no indication within the policy as to how this road bridge will be paid for. The previously superseded draft Policy A30 required developers to cover the cost of the road bridge, estimated to cost £15m to build, excluding the value of the land.

Although in the light of CIL regulations and the limit of 5 x S106 contributions towards a single infrastructure project, there is a strong possibility of a significantly high financial burden being levied against a small amount of development schemes that may come forward in the Ash and Tongham area.

Nevertheless, it is contended that the road bridge is not required to alleviate any highway safety and congestion issues. The application for 154 dwellings (16/P/01679), has shown through the transport assessment and data on queuing in the vicinity of the level crossing during barrier downtimes, that the current proposal on its own, or in combination with other approved development schemes, will not cause a highway safety issue. The proposed road mitigation measures proposed as part of application 16/P/01679, will improve traffic movements on the immediate highway. SCHA have accepted the applicant’s findings and have not raised any objections to the proposal or indeed sought the provision of a road bridge as part of the 154 dwelling scheme.

The policy also requires developers to provide land for the road bridge, with no mention of Compulsory Purchasing the land required for the road bridge or how the land will be acquired.

We therefore contend, that the road bridge requirement of Policy A29 would fail to comply with CIL regulations should GBC seek to fund the scheme through S106 contributions.

“Planning obligations should not be sought where they are clearly not necessary to make the development acceptable in planning terms. Planning obligations must be fully justified and evidenced.”
(Paragraph: 004 Reference ID: 23b-004-20150326 Revision date: 26 03 2015)

It is contended, that the road bridge is not justified or evidenced as being necessary to alleviate pressures on the local highway from proposed new development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  Regulatuion 19 Consultation Draft Local Plan Policy A29.pdf (378 KB)
For this reason, it is contended that the above site should be considered for inclusion within the Site Allocations Document of the Draft Local Plan. The site is considered to be a suitably located and sustainable site on the edge of East Clandon.

The site is in the ownership of Clandon Regis Golf Club, the land is surplus to the Golf Club’s requirements, and save for any proposed development scheme maintaining a reasonable buffer between it and the Golf Course, the proposal would not have any negative impact on the Golf Course.

In particular, H1 (9) seeks to make provision for self-build plots and custom housebuilding plots on smaller sites, yet the policy seems to focus and encourage more the provision self-build on strategic housing sites of 100 units and above, where a 5% allocation is sought. It is contended, that more emphasis should be placed on facilitating self-build and custom housing provision of smaller sites coming forward for self-build housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4141  Respondent: 11156833 / Stella Clarke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

You provided me with a written invitation to view and comment on the new plan for the area.

I would like you to note my objection to the proposal to alter the settlement boundary of Shalford which would bring in to projected use fields between the main road to wonersh and cranleigh , and chinthurst lane.

I object to the plan on the basis that any new development in this area will generate additional risk of flooding from drainage issues on Chinthurst hill; additional traffic congestion and risk of accidents in on already busy and narrow roads in the area. The infrastructure of the area with poor road capacity already struggles to cope with traffic that attempts to get in to and around Guildford via Shalford and Chilworth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/798  Respondent: 11156897 / Ian Camfield  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (south)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposed boundary changes for the following reasons:

- GBC should support the expressed view of local residents in protecting the fields behind the village hall from development. They should be retained within the current green belt and kept outside the village settlement boundary. The boundaries are long established and there is no valid reason to change them.
- Over 700 residents signed a petition objecting to the proposed settlement boundary change only last year. The local community is united in this stance.
- The land contributes to the open character of the village and provides an attractive setting for the village's community facilities.
- The land’s elevation is 32ft above King’s Road, the highest in the area. Any housing development built on it would tower over the community facilities and surrounding area.
- Access to this land is via Chinthurst Lane, an already congested country lane which acts wrongly as an overflow parking area for Shalford Station and causes back-up on the Cranleigh Road for traffic turning in if cars are proceeding in the opposite direction. There are no passing pull-ins and dangerous reversing is often the only solution to give way.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/535  
Respondent: 11157121 / D Griffin  
Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Re: New Version of Local Plan - Objection to changes to Shalford Green Belt/Settlement Boundary.
I am writing to express my strong objection to plans to move the green belt boundary to exclude the open space behind the Village Hall and Tennis courts, and to include these fields in the settlement boundary. I understand there is much local dislike of the plans, evidenced by a large number of petition signatories who are alarmed by the plan. The space in question is undoubtedly a key part of the local landscape, and contributes to the open character of the village centre. Any housing on this land would detract from the spacious vista enjoyed by users of the community amenities such as the Tennis and Bowls clubs. As a user of the Tennis club myself, I am aghast at the prospect of losing this open space. Finally, and equally damning, access to any significant housing development on the fields would place an unsustainable burden on the traffic capacity of Chinthurst Lane, which is already heavily congested during rush-hours.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6673  
Respondent: 11157121 / D Griffin  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
I am hereby objecting to any plan to build houses on current greenbelt land. Reclassifying the land is merely sleight of hand. As to 'Affordable Housing', there will never be any truly affordable housing as long as the government (local and central) worships at the altar of Market Forces. Moreover, no normal developer will build affordable houses because:-

a) The price of land (dictated by market forces) represents the majority of the cost;

b) As soon as someone moves into affordable housing, they will think about selling at the market price, thereby instantly converting that house from affordable to unaffordable;

Truly affordable housing requires release of cheap land (not green belt, as this belongs to everybody!), and benevolent developers who can show that they build efficiently, well, and do not make excessive profit.

Finally, the main reason that starter homes are so expensive in the Guildford area, is that so many students live in buy-to-let housing, instead of accommodation provided for them by the University on University land. The University's past practice of selling their land (which they were given free of charge to provide facilities for their staff and students) to commercial developers and speculators, is an absolute disgrace.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is a large open space in front of Tesco, adjoining the hospital. Apart from breaking up what is already very low density of development this appears to serve no real purpose apart from the occasional balloon launch, and one or two small children’s players. At the time of writing it is just been invaded by gypsies. To my mind this would make a good retail development site Poor possibly a residential one associated with the hospital and University and could stand something reasonably high. The opportunity cost of it sitting there is a considerable number of million pounds. The children’s play Area use could be retained in any new development.

Since we moved here 23 years ago the talk has been of a major retail development on North Street adjacent to the existing Friary Centre. There has been minimal progress, and nothing to see, during this period which is a desperate indictment of how planning policy in the town is implemented. Hopefully the proposed John Lewis store will come to pass whilst hope that your downfall North Street will need to be pedestrianized the same extent that the High Street is i.e. closed to traffic during the bulk of the day.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2403  Respondent: 11157345 / John Harrison  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

With regard to power requirements, sustainable solutions close to significant development should be explored such as solar, possibly on the roofs of new dwellings, and the suitability of the Downs as a site for wind turbines, especially perhaps associated with the Research Park and the University area - where a modern and progressive image is appropriate - should be explored. In many senses turbines can be aesthetically beautiful, particularly once what they achieve and what they avoid is known.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2406  Respondent: 11157345 / John Harrison  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
All housing should be designed so that it is suitable for all ages by, for example, the inclusion of bar handles or toilet blushing buttons that are not too stiff for old people to use. This would have no adverse impact on younger people in such matters are generally simply an issue with good design. They need not bad to the cost of development they just require a little more thought prior to development in the more detailed specification; if such is required in this area it is likely to extend to other areas of construction resulting overall in a far better product. This is covered at 4.2.4 except that the word all is absent. The plan would be better if it were added.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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The 40% affordable housing allocation is not as demanding as it sounds given that only 10% of private units are one bedroom whereas 40% of the social units are one bedroom. I thought the need for social housing was from young families with children. In any event these have a great acclaim to their own home where is young single people are much more capable of living in shared accommodation and can be more mobile. I would be interested to see how are you arrived at your rather convenient demand analysis.

And as to who qualifies for the social housing this is not clear. In London it can, I believe be available to households with a combined income up to £85,000 which is a long way from what most people would expect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/2399</th>
<th>Respondent: 11157345 / John Harrison</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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Please take into account the following comments on the local plan.

At the local meeting I went to, Paul Spooner emphasised that all the major strategic development was contingent on major infrastructure improvement. This is not sufficiently clear in his forward to the plan. Paragraph 4, for instance, it should be unequivocal and say something like the existing infrastructure in the borough is under severe pressure: traffic congestion is 12 highest in Europe and there is very little capacity for increased electricity consumption. In order not to exacerbate the current shortcomings no significant new development will be permitted until the necessary finance for increasing the capacity of local roads including in particular the A3 and Guildford town centre one-way system has been secured and implementation timetabled.

This will ensure that the developers have realistic expectations as to when sites can be brought forward and avoid the risk that the proviso to plan gets overlooked in the future.

Paragraph 2.15 is a statement of the obvious. It can take two hours to cross from one side of Guildford to the other which is totally unacceptable and imposes huge diseconomies, social costs and additional pollution. It should be amended to read: “There is an urgent requirement to increase the proportion of trips undertaken on a sustainable basis notwithstanding the anticipated increase in population. The council will encourage cycling, walking and the use of public transport and discourage inefficient use of the private motorcar by all means possible including consideration of congestion charging, encouraging car sharing, discouraging single occupancy use and working with local schools to substantially reduce the number of children dropped off by car, and to explore the possibility of specific school-related traffic management initiatives and, particularly in the morning rush hour, such as short-term one way streets or temporary closure to through traffic of critical residential roads used for the “school run”.

Similarly, 2.22. To say that the infrastructure is experiencing additional stress in no way conveys how overloaded the road system in particular is. There must be sufficient quantitative data to demonstrate just how unacceptable the existing situation is nevermind the possibility of adding to it.

Other terms of the size understanding of Guildford had bypasses created in the 1970’s, 1980s and 1990s. Guilford was introduced in the 1930s since when traffic volumes have increased beyond all expectations. On any objective Analysis Guildford is in need of an additional bypass. In normal circumstances this would take the form of a southern loop to create a circle around the urban area but this is not possible given the attractive and protected nature of the countryside. The idea of the tunnel therefore beneath the existing A3 could be an excellent solution. The notion of simply widening the existing A3 Will have a lot of detrimental environmental impacts. For example, living here we are 2 miles from the A3 but we can still hear the roar of the traffic from the out of town section which lacks sound absorbing tarmac and due to to the prevailing wind direction.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/2405</th>
<th>Respondent: 11157345 / John Harrison</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The housing table in the appendix sets out clear housing targets but the fact that these are dependent upon prior infrastructure improvements is not equally clear. It seems to me that there is every possibility that the numbers in the table will be seized upon and the proviso will be forgotten. There is also a very real risk that construction of the houses will be commenced in anticipation of the improved infrastructure which will subsequently be cancelled. This cannot be allowed to happen and this risk must be totally eradicated in the way the plan is written.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4524  Respondent: 11157409 / Burpham Neighbourhood Forum (Ros Pollock)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Where is the evidence to prove that we need so many houses in our area?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18539  Respondent: 11157409 / Burpham Neighbourhood Forum (Ros Pollock)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Adequate infrastructure is not in place to accommodate these developments and no provision has been allowed for such – particularly roads and waste. The local roads cannot handle the current traffic numbers – without significant investment in alternative road systems the local area will become completely clogged with traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18541  Respondent: 11157409 / Burpham Neighbourhood Forum (Ros Pollock)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support a tunnel from Send to Compton that takes the through traffic on the A3 away from our local roads. I also support a four way junction at Send or Potters Lane with a direct route through to Merrow. I also support a four way junction at the A3/A320 in Guildford so that A3 traffic have direct and improved route through to Woking

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18540  Respondent: 11157409 / Burpham Neighbourhood Forum (Ros Pollock)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I disagree strongly that building should take place on the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/2115  Respondent: 11157409 / Burpham Neighbourhood Forum (Ros Pollock)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I think there needs to be an extended consultation period to address the above critical issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp172/2667  
**Respondent:** 11158177 / Adam Walker  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (No), is Legally Compliant? (Yes)

**Answer (if comment is on questions 1-7 of the questionnaire):**

Policy A26 outlines extensive development and expansion but does not provide an adequate increase in infrastructure to support it.

Also, this area is currently used for recreational purposes by SRP employees and nearby residents - the allocation does not specifically include recreational space (e.g. parks) to replace the land that is being allocated for development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Regarding policy A26, you have added a secondary school to the allocation, yet I do not believe there is sufficient access to make this sensible.

You have now stated that Gill Avenue is to be a primary access route - this road is already heavily congested due poor access management by the hospital (vehicles for the front and rear of the hospital entering and exiting via different roads instead of one main road).

You have also stated that the link road from the A31 will be access controlled. Assuming people attending the secondary school will not just be living in this area (you have stated this in allocation (9)), how are they supposed to get in? Again you are assuming that all traffic will enter via the already congested Gill Avenue. I can see the link road being of benefit to SRP (I work there by the way) but not to anyone else. There is still no provision for a road joining Aldershot Road to this area without going through Park Barn and Broad Street - you only state "Developer to provide the western route". This should be set out in the plan and not subject to a developer making a mess of it later.

I would also have expected the Park Barn railway station (A59) to have been placed within the A26 area, and to include park & ride via the railway. Buses get stuck in traffic as well and therefore are not suitable for P&R unless the roads are significantly improved.

I am at least glad that you've added a point about pedestrian and cycle access. I expect the access to the north-west of SRP (via the footpath and tunnel under the railway) to be maintained during any work in this area as it is now frequently used.

Further regarding A59, direct pedestrian access to SRP should be added as a requirement (i.e. don't assume access via RSCH). It should also be stated that pedestrian access from SRP / RSCH to Park Barn should be mandatory and available at all times (i.e. not restricted by being "station property" and "not a public right of way").

**Attached documents:**

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Comment ID: pslp172/469  
**Respondent:** 11158785 / Ann Rowles  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: PSLPS16/691  **Respondent:** 11159809 / Hilary Road  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

Following the last consultation on the draft local plan for Send, the plan was adjusted and we were informed that there would not be further development to the plan. I trusted that this would be the case. The late amendment to the plan came as a dreadful shock. Guildford B.C. have not followed correct process. Since 2014 GBC. has changed every major site in Send proposed for development and has now added a massive new road junction. I object. I object to the proposed housing development at Garlick's Arch and I object to the proposed large industrial site, for the following reasons:

1. Potential flooding which would impact seriously on Send Marsh. I understand that this is a distinct possibility.
   1. Traffic congestion on this already very busy area. The traffic generated by a large industrial site would make life intolerable. The amount of traffic on the Portsmouth Road already makes it extremely difficult for the elderly and disabled to cross the road other than at the crossing in Ripley Village.
   1. Lack of infrastructure to support additional needs for education and medical services of the large number of new residents.
   1. Poor public transport services which obliges residents to travel by car.
   1. Garlick's Arch is home to ancient and irreplaceable woodland.

I object to the proposed enormous housing development at Wisley. If this plan was previously rejected by Guildford Council, why is this proposal now considered viable? What has changed?
I object that there is no proposal to provide access to the A3 for the the development which would seriously impact on Ripley and Send, where traffic is busy at all times and subject to gridlock at critical times of the day.

I object at the sudden proposal to remove Ripley, Send, Clandon and other villages from the greenbelt. The open fields are the lungs of the district, in addition, they do much to ease potential flooding. A most casual glance at the surface water which spreads across the area after rainfall would alert one to the risk of flooding.

The villages provide a buffer between Guildford and Woking, and will become urbanised without the infrastructure and resources needed for support.

What is the purpose of consultation? Consultation is offered, due response is made, draft plans amended, then new and more extensive proposals are offered for consultation. This time there is a short period allowed for consideration of a weighty document which is accessible only with difficulty, by the unprofessional reader who would be affected. I object.

I further object to the disproportionate development concentrated in one area of the borough.

Please reply to this letter and ensure that it is put before the Inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp173/296  Respondent: 11159809 / Hilary Road  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Once again the plan for Send has returned to bring overwhelming dismay and grave concern to the people of this Village. The Planning Committee received 32,000 objections to its proposals, a large proportion of which are from Send. Are they of no consequence? I realise that they come not from powerful corporate bodies, but they do come from families who are council tax payers, who live in, and have regard for the area, and whose lives are most deeply affected by these changes.

I object that the new plan has taken no account of the repeated objections of the people of this Village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2418  Respondent: 11159809 / Hilary Road  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy A42

This increases the planned 45 houses to 60.
The impact on traffic will make an already congested area extremely difficult.
The surface flooding in this area is already bad, has this fact been considered?

Has there been consideration of the need for additional medical and educational provision for these additional families?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2419  Respondent: 11159809 / Hilary Road  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A43 Garlick.s Arch. Send Marsh.
in addition to 400 houses , for which there is no allocated increase in medical or educational provision, an additional allocation of 6 for six travelling show people.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2420  Respondent: 11159809 / Hilary Road  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 and the allocation of 9.26 hectares of Greenbelt land at Burnt Common. The 7.000 square feet of industrial space is "open ended"

Where is the evidence of need or demand for this?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: pslp171/818  Respondent: 11159809 / Hilary Road  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object that all these proposed developments are on Greenbelt land

Must the people of Send, which comprises some 11% of the Borough, have imposed on them 40% of the development of the whole Guildford Plan? This would see the village become submerged by overdevelopment, at even greater risk of flooding, traffic congestion, an industrialised area conjoined to Woking and Guildford by houses for families for whom no additional provision has been made.

The Government has repeatedly spoken in defence of the Greenbelt. Is Send excluded from this?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/653  Respondent: 11160001 / Andy Freebody  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPA16/654  Respondent: 11160001 / Andy Freebody  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? (    ), is Sound? (    ), is Legally Compliant? (    )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)
   - The “objectively assessed need” figure of 693 homes a year is too high.
   - A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
   - The current SHMA inflates the proposed housing figure due to
     - failure to correct for errors in the historical data for international migration flows,
     - issues with the way it considers students and affordability and
     - flaws in the method for estimating the number of homes needed to support job growth.
   - It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the possible inclusion of the land on the A246 between Clandon cross roads and Merrow roundabout being included in the draft plan at the last moment in the hope that it will be accepted as being suitable for development without proper consultation having taken place.

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/972  Respondent: 11160001 / Andy Freebody  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to Gosden Hill development being in the Local Plan The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/973  Respondent: 11160001 / Andy Freebody  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).
The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/975  Respondent: 11160001 / Andy Freebody  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.
This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/2017  **Respondent:** 11160001 / Andy Freebody  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/2014  **Respondent:** 11160001 / Andy Freebody  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2015  Respondent: 11160001 / Andy Freebody  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2016  Respondent: 11160001 / Andy Freebody  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances."

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID:</th>
<th>PSLPP16/2018</th>
<th>Respondent:</th>
<th>11160001 / Andy Freebody</th>
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<td>Document:</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. **I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)**

   Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

   Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

   I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

   Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

   With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

   The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

   The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

   1. **I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)**

   Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2010 Respondent: 11160001 / Andy Freebody Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2011  Respondent: 11160001 / Andy Freebody  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Borough Wide Strategy (Policy S2)

   1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.
   2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
   3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For
instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1908  Respondent: 11164225 / David Avery  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I formally write to convey my objection to your Local Plan. It is really time that Guildford Borough Council start listening to the residents of Guildford and stop decimating our villages. The Guildford Borough Council planning committee are motivated by financial incentives, back handers by any other name in order to pass these outrageous planning applications. A point worth noting is that of the current Vision Engineering factory construction: The planning was passed with the majority of residents OBJECTING and without any special conditions being satisfied but the planning committee accepted financial kickbacks from Vision Engineering in order to pass the application. The planning committee need to learn by their mistakes and realise that these actions are both abhorrent and totally unacceptable behaviour. They should visit this site so as they may learn how to read construction drawings and how an A3 2D site plan converts into the monstrosity that exists today. You can’t keep overloading our villages with more and more houses and with totally unsuitable industrial units, when there are much better locations within the borough, namely brownfield sites. The construction of a new marina is another example of the Guildford Borough Council not listening to local people and the interests of the majority vs. their financial gain.

For the avoidance of doubt:-

1. I OBJECT to Send Village being removed from the Green Belt.
2. I OBJECT to the building of 45 houses at Clockbarn Nursery
3. I OBJECT to the building of 400 houses and 7000 sq metres of industrial space at Garlick’s Arch
There are far more appropriate brownfield sites to build 400 houses and there is industrial space at Slyfield site. Why have Guildford’s housing needs and supporting evidence not been made available?

4. I OBJECT to the development of 40 houses and 2 travellers’ pitches at Send Hill. Yet again the local roads and infrastructure cannot support the development of 40 houses in this inappropriate location.

5. I OBJECT to a new interchange with the A3 at Burnt Common. Send village just can’t cope with the traffic now, so what do you think the opening of a new interchange would do to traffic through the village?

Simple Cause and Effect analysis would have highlighted that adding a new interchange with the A3 at Burnt Common just becomes a magnet for traffic from the proposed 2000 new houses at Wisley Airfield, 2000 houses at Gosden Hill, Burpham and 1850 at Blackwell Farm. The majority of that increased traffic would go through Send causing overload and gridlock. It’s gridlocked into Woking when there are roadworks in Old Woking!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 11164225 / David Avery</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I object to the proposal to inset Send Business Park from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation.
- You’ve already allowed a marina to be built and again against local objections.
- There is highly restricted vehicular access along Tannery Lane in both directions.
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate.

You allowed both the Vision Engineering eye saw to be built and the building of a marina within Send village green belt when the majority of the residents of Send objected. The council needs to stop accepting financial incentives from developers/owners in order to get planning permission granted. Listen to the residents of Send and STOP wrecking our village. I don’t suppose that any of the proposed building projects are anywhere near those on the council’s planning committee! How would you like a B&Q warehouse (Vision Engineering), marina or caravans located near your home and in your village? STOP!!!!

The roads in Send just can’t cope now, get the council’s planning committee to visit (not during school holidays) Old Woking and see the gridlock of cars in the morning and evening. Does the council’s planning department have access to any traffic analysis simulation tools? These may help them investigate the consequences of their clueless local plan on the roads, resources, green belt and local residents.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A42 change at Clockbarn in Tannery Lane because:

- The increase to 60 homes in place of 45 homes is **33% more** and it was too much at 45 homes so 60 is totally unacceptable.
- It ignores all the **hundreds of previous objections** made by local people! Why don’t you listen to the major of local people that object?
- It will worsen access and traffic problems in Tannery Lane and at the A247 junction. This junction is dangerous now!
- It will make erosion of the Green Belt in our village worse. You’ve already got rid of too much STOP now!
- It will make surface water flooding, which is already bad, even worse
- It will impact open countryside views from the River Wey Navigation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp172/3758</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43 change at Garlick’s Arch because:

- It ignores all the **thousands of previous objections** made by local people
- There is no proven demand for Travelling Showpeople plots in this location and [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]
- It is beautiful permanent Green Belt and no “exceptional circumstances” exist and financial back-handers to the council from the developers does not equate to “exceptional circumstances”
- It will cause over-development of our village and the number of homes is excessive
• It is exquisite ancient woodland that existed at the time of Elizabeth 1
• It will join up Ripley and Send and defeat the key purpose of Green Belt
• It is subject to frequent flooding and is currently a flood zone 2 allocation
• It is contaminated by lead shot accumulated over fifty years
• It will generate excessive traffic that will block up the local roads of Send and Ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3759  
Respondent: 11164225 / David Avery  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A 58 at Burnt Common because:

• It was deleted from the 2014 draft because of all the objections made previously
• The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land
• There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
• The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt
• The impact on small surrounding roads will create traffic gridlock
• It will join up existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2567  
Respondent: 11166081 / Charlotte Mercer  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the Guildford Borough Council (GBC) Local Plan 2017 on the grounds that the proposals contained in the policies H3 and all of the provisions maps diagrams and assumptions, have not been properly scrutinised by the planning committee or other relevant bodies nor by the people of the borough - by reason of copyright infringement on GL Hearn’s intellectual property.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp17q/459  **Respondent:** 11166081 / Charlotte Mercer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**ASSIGNMENT OF COPYRIGHT**

18.1. The Service Provider hereby assigns to the Council all vested contingent and future rights of copyright and all rights in the nature of copyright and all accrued rights of action and all other rights of whatever nature in and to the reports (which shall include all plans drawings documents (write and electronic) and presentation material and all other material capable of being subject to copyright produced by the Service Provider in the course of undertaking the Service for the Council) prepared under the terms of the Contract whether now known or in the future created to which the Service Provider is now or may at any time after the date of the Contract be entitled by virtue of or pursuant to any of the laws in force in each and every part of the world.”

As a consequence of this and since the report and various findings represents a very large proportion of the local plan, the entire proposed GBC Local Plan 2017 as amended, is in my view fatally flawed and should be thrown out. Additionally, if were to consider the so called ‘evidence base’ contained in the proposals in this plan, they are contrary to a large portion of the National Planning Policy Framework (NPPF) particulary applying to the Green Belt and proposals for development and change including the disgraceful proposals (original and amended) concerning unapproved boundary changes and ‘insetting’ designed to allow as much development on the Green Belt as possible.

As an example of how the Green Belt including openness should be protected from inappropriate development, there is a recent High Court judgment in the case of R (Boot) v Elmbridge Borough Council [2017] EWHC 12 (Admin) which provides useful clarification on the approach that local planning authorities should take when applying paragraph 89 of the National Planning policy Framework (NPPF) to applications for development within the Green Belt.

This case concerned a proposal to build a new sports centre which local residents where concerned was inappropriate and would harm the openness of the Green Belt. The details are reproduced here:

The claimant argued that if a new sports facility caused harm to the openness of the Green Belt - even limited harm - it was not appropriate development. Mr Justice Supperstone ruled that the first ground had been made out. The judge said the conclusion of the council that the proposal had a "limited adverse impact on openness” of the Green Belt was not a finding that there had been compliance with the policy that required openness to be preserved. “Accordingly even if the adverse impact referred to at para 95 of the OR [officer’s report] is acceptable for the purposes of DM17 [the council’s development plan policy – Green Belt (Development and New Buildings)], it is not acceptable for the purposes of para 89 of the NPPF,” he said.
The judge also accepted counsel for the claimant’s submissions that West Lancashire Borough Council v SSCLG [2009] EWHC 3631 established that if “a proposal has an adverse impact on openness, the ‘inevitable conclusion’ (see para 22 of the judgment) is that it does not comply with a policy that requires openness to be maintained. A decision maker does not have "any latitude" to find otherwise, based on the extent of the impact.”

In the present case, Mr Justice Supperstone said, the defendant council “concluded that there was an adverse impact on openness, but nevertheless granted permission without giving consideration to whether under paras 87 and 88 of the NPPF there were very special circumstances that would justify it.” The High Court judge rejected the second ground of challenge, saying the two proposals were materially dissimilar. The development of a sports centre is not materially dissimilar to building houses and other buildings in the Green Belt and in no way could it be said that such housing development would not harm the Green Belt.

The GBC Local Plan 2017 in its original form and as amended, is contrary to the following NPPF guidelines: NPPF planning guideline Paragraph 79; NPPF planning guideline Paragraph 80; NPPF planning guideline Paragraph 81; NPPF planning guideline Paragraph 82; NPPF planning guideline Paragraph 83;

NPPF planning guideline Paragraph 84; NPPF planning guideline Paragraph 85; NPPF planning guideline Paragraph 86; NPPF planning guideline Paragraph 87; NPPF planning guideline Paragraph 88; NPPF planning guideline Paragraph 89; NPPF planning guideline Paragraph 90; NPPF planning guideline Paragraph 91; NPPF planning guideline Paragraph 92; and NPPF planning guideline Paragraph 109.

In addition, I object to policies: A25; A26; A27; A28; A29; A32; A35; A37; A38; A39; A40; A42; A43; A44; A58; A49; A55; A56; A57 on the grounds that all these sites earmarked for development and change detailed on the plans and diagrams, are either Green Belt, green farmland, ANOBs, or wrongly designated as urban land when they clearly are not.

The corresponding proposed housing requirements and all related infrastructure including roads; water; gas; sewerage; refuse collection and treatment and telecommunications assessments etc, are hopelessly flawed, inaccurate and in some cases missing. Additionally, the ‘evidence base’ consisting of thousands of pages of closely written text and graphs/diagrams is so completely incomprehensible to many ordinary people, that most will not even attempt to read or understand it.

It seems to me that real evidence is mistaken for wildly inaccurate assumptions and projections. One might perhaps conclude that this could appear to be a deliberate policy to avoid proper scrutiny, but I am sure this is very unlikely.

In conclusion it is my opinion that the scale and size of development and change as proposed in the Guildford Local Plan is breathtakingly inappropriate and would irrevocably change the whole character and environment of Guildford. Such a plan if approved would allow several ‘medium sized towns’ to be built in the villages and Green Belt areas of the borough. The desire to increase house building and development is not an exceptional or valid reason to build on and destroy the Green Belt land. This has been stated many times in the NPPF and confirmed by several recent legal judgements.

I urge GBC to listen to and heed the views of local people as required by the localism act and reject this ill-conceived and highly damaging proposed local plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp172/4311  **Respondent:** 11166497 / CALA Homes Southern Home Counties (Sir or Madam)  
**Agent:** Vail Williams LLP (Jane Terry)  
**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Introduction
USE OF PREVIOUSLY DEVELOPED LAND

Section 4 of the Plan under Site Allocations A1 - A58, is split into sections including ‘Previously Developed Land in the Green Belt’.

The Plan proposes the redevelopment of two sites (A32 Surrey Police Headquarters and A33 The University of Law). As highlighted above, the NPPF encourages ‘… the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;’

Land at Treetops Boarding Kennels and Loxhill Nursery, Old Portsmouth Road, Guildford was assessed through the 2014 SHLAA (Site 2118) as being suitable, available and achievable for the delivery of residential development subject to a satisfactory relationship within the Green Belt, and in relation to the AONB, conservation area and listed building. The site’s development potential was considered to be in the order of 12 units on 2ha, at a density of just 6dph. The site was confirmed as both available and achievable. An application for the site’s redevelopment for 39 dwellings 17/P/00801 is currently being considered by the Council. It is considered that this application reaches a balance between making most effective and efficient use of available previously developed land whilst still respecting the site’s environmental constraints. The resulting density remains very low at 20dph.

Again, at paragraph 14 of the NPPF, the definition of sustainable development is confirmed:
‘For plan-making this means that:

- local planning authorities should positively seek opportunities to meet the development needs of their area;
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change.’

The effective use of such previously developed land will assist the local planning authority in meeting its objectively assessed housing needs and in so doing respond positively to wider opportunities for growth as required by the NPPF.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:**  pslp172/4312  **Respondent:**  11166497 / CALA Homes Southern Home Counties (Sir or Madam)  
**Agent:**  Vail Williams LLP (Jane Terry)

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Policy A34
Site Allocations:
Land at Treetops Boarding Kennels and Loxhill Nursery, Old Portsmouth Road should be added to the list of sites in the Previously Developed Land in the Green Belt category of Site Allocations as follows:

<table>
<thead>
<tr>
<th>New Site</th>
<th>Description</th>
<th>Location</th>
<th>Size</th>
<th>Zoning</th>
</tr>
</thead>
<tbody>
<tr>
<td>A34</td>
<td>Treetops Boarding Kennels and Loxhill Nursery</td>
<td>Shalford</td>
<td>Homes (C3)</td>
<td>39</td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2681  Respondent: 11166497 / CALA Homes Southern Home Counties (Sir or Madam)
Agent: Vail Williams LLP (Jane Terry)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Use of Previously Developed Land

Section 4 of the Plan under Site Allocations A1 - A58, is split into sections including ‘Previously Developed Land in the Green Belt’.

The Plan proposes the redevelopment of two sites (A32 Surrey Police Headquarters and A33 The University of Law).

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New Site A34 Treetops Boarding Kennels and Loxhill Nursery Shalford Homes (C3)39

ii) Policy P2: Green Belt
Policy P2 should be amended to recognise the potential that previously developed sites within the Green Belt can make to housing delivery. As such an additional section should be added as follows:
‘Use of Previously Developed Land
(7) The redevelopment of previously developed land within the Green Belt is considered to be appropriate provided that it is appropriate to the scale of the locality and has a beneficial impact on the character of the countryside or the local environment in terms of improving the local built fabric.’

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2676</th>
<th>Respondent: 11166497 / CALA Homes Southern Home Counties (Sir or Madam)</th>
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<tr>
<td>Agent: Vail Williams LLP (Jane Terry)</td>
<td></td>
</tr>
</tbody>
</table>

| Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

SPATIAL VISION AND POLICY S2: BOROUGH-WIDE STRATEGY
Reference should also be made to the HBF representation which, as members, we fully support.

Objectively Assessed Housing Need

The West Surrey SHMA 2015 concluded that there was an objectively assessed need for 13,860 dwellings (693dpa) in Guildford Borough. This conclusion was based on drawing together the following threads:
- The SHMA calculated an expected employment growth of 13,860 in the borough over the Plan period 2013-2033 giving rise to 693dpa;
- This figure was then adjusted to include:
  - Affordability pressures - Both across the HMA and in Guildford Borough itself, affordability has long been recognised as a critical issue. The level of households per year that are expected to require support to meet their housing needs and thus be eligible for affordable housing is significant at 455 households per year. A significant proportion of these are younger households. The SHMA responded to this level of need by seeking to improve affordability through adjusting the household formation rates to the 2001 level arising in a need of 668 dpa;
  - Student growth - A higher than anticipated level of growth in the student population than previously assumed in the demographic analysis and taking into account planning assumptions that a greater proportion of students would live in households rather than university managed accommodation; The Guildford Addendum Report, 2017 has been published to the West Surrey SHMA 2015 and has been used to inform the number of houses planned for over the lifetime of the Local Plan 2013 - 2033. The 2017 Addendum concludes that there is a need for 12,426 homes between 2015-2034 (654dpa), some 50 dpa less than the 2015 SHMA Report.

There would appear to be an over-reliance on economic factors affecting the housing requirement in a climate with much uncertainty with Brexit negotiations currently at an embryonic stage. The extent of the impact depends on international negotiations that are yet to take place and the government’s future policy response. This means that any estimates made will be subject to a high degree of uncertainty. The NAO Analysis Report July 2017 confirms that ‘Uncertainty will continue to remain for some time around the forms that trading relationships will eventually take after the UK leaves the EU’.
In the current climate where there is considerable uncertainty over the Brexit negotiations it is far too early to make assumptions about the implications they may have for the economy and particularly housing requirements. Accordingly, such elements as international migration should be set aside until such time as a greater degree of certainty as to the outcome is known.

It is therefore considered that the 2017 Guildford Addendum Report is premature in concluding a reduction in the objectively assessed housing needs of the Borough and that these should revert to the 2015 West Surrey SHMA figures.

Further, the NPPF which seeks to promote housing growth. Indeed one of the Core Planning Principles at paragraph 17 of the NPPF states that planning should:

‘Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth.’

More specifically, it should:

‘Encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;’

The effective use of such previously developed land will assist the local planning authority in meeting its objectively assessed housing needs and in so doing respond positively to wider opportunities for growth as required by the NPPF.

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**Attached documents:**

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<th>pslp171/2677</th>
<th>Respondent:</th>
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<tbody>
<tr>
<td>Agent:</td>
<td>Vail Williams LLP (Jane Terry)</td>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
</tr>
</tbody>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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The effective use of such previously developed land will assist the local planning authority in meeting its objectively assessed housing needs and in so doing respond positively to wider opportunities for growth as required by the NPPF.

Duty to Cooperate

Reference is made in the Housing Delivery Topic Paper to the Memorandum of Understanding on housing delivery which was signed by the three authorities in the Strategic Housing Market Area, Guildford, Waverley and Woking. The MoU recognised that there is unmet need within the HMA and committed the three authorities to continued joint working to ensure housing needs across the HMA are met in full.

It is therefore also of some concern that the 2017 Addendum covers only Guildford Borough and therefore looks at the Borough in isolation from the rest of the Strategic Housing Market Area (Waverley and Woking). This has been highlighted through discussions at the Waverley Examination at the end of June 2017. The generally agreed view there was that Waverley were being overly prescriptive in their application of landscape designations and that further housing provision could be accepted as a result. Conversely, Woking, which adopted its Core Strategy in 2012 for the period up to 2027, plans for a housing provision of just 292dpa as opposed to its objectively assessed need of 517dpa. Consequently there is a significant unmet need in Woking Borough which should be addressed across the HMA as a whole. Neither Waverley, nor Guildford appear to be taking the Duty to Cooperate very seriously in this respect, demonstrated by the view expressed in the Topic Paper that Guildford is unable to sustainably accommodate any unmet need arising from Woking despite a rigorous justification to support that view, and the 2017 SHMA Addendum considering the needs of Guildford Borough in isolation from the rest of the SHMA. As a result of the debate at the Waverley Examination, it is therefore
highly likely that the Inspector will recommend that Waverley takes a significant proportion of the unmet need from Woking, leaving the remainder to be identified within Guildford Borough. Further scrutiny of the constraints and opportunities for accommodating further development within Guildford to meet the overall needs of the SHMA must therefore be undertaken before the Duty to Co-operate can be considered to be appropriately discharged.

**Five-year Supply of Housing Land**

The 2017 Addendum to the LAA sets out the five year housing requirements 2019 - 2024 and the identified supply. Applying the 20% buffer as a consequence of persistent under-delivery, there is a shortfall over the five year period of some 881 units. Planning for a shortfall in the five year housing land supply at the outset of the Plan period, cannot be considered to be effective and the Plan is therefore currently considered unsound in this respect.

Where there is scope to increase the quantum of development on previously developed land this should be considered and an adjustment made to the proposed allocation sites accordingly.

**Soundness**

As a consequence, of the discussions above, objection is made to the Plan’s ‘Spatial Vision’ and Policy S2: Borough-wide Strategy, which reduces the delivery of homes from 13,860 to 12,426 in the period up to 2034.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

i) The delivery of housing should be reinstated to at least the level set out in the 2016 draft Plan i.e. ‘at least 693 dpa’ but with a further allowance to cover the current shortfall in housing land supply (881 units) plus a 10% buffer to secure flexibility and resilience across the Plan period.

Attached documents:

**Comment ID:** pslp17q/497  **Respondent:** 11166497 / CALA Homes Southern Home Counties (Sir or Madam)  
**Agent:** Vail Williams LLP (Jane Terry)  
**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Co-operate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**Agent:** Vail Williams LLP (Jane Terry)  
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

MODIFICATIONS Sought TO THE PLAN
The Plan is not considered to be either positively prepared or justified. Neither is it considered to be effective in terms of delivering sufficient new homes to meet the objectively assessed housing needs of the Borough. Accordingly the Plan is currently considered to be unsound and the following amendments are sought:

i) The delivery of housing should be reinstated to at least the level set out in the 2016 draft Plan i.e. ‘at least 693 dpa’ but with a further allowance to cover the current shortfall in housing land supply (881 units) plus a 10% buffer to secure flexibility and resilience across the Plan period.

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iii) Policy P2: Green Belt
Policy P2 should be amended to recognise the potential that previously developed sites within the Green Belt can make to housing delivery. As such an additional section should be added as follows:
‘Use of Previously Developed Land (7) The redevelopment of previously developed land within the Green Belt is considered to be appropriate provided that it is appropriate to the scale of the locality and has a beneficial impact on the character of the countryside or the local environment in terms of improving the local built fabric.’

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/496  Respondent: 11166497 / CALA Homes Southern Home Counties (Sir or Madam)
Agent: Vail Williams LLP (Jane Terry)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Duty to Cooperate
Reference is made in the Housing Delivery Topic Paper to the Memorandum of Understanding on housing delivery which was signed by the three authorities in the Strategic Housing Market Area, Guildford, Waverley and Woking. The MoU recognised that there is unmet need within the HMA and committed the three authorities to continued joint working to ensure housing needs across the HMA are met in full.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5743  Respondent: 11168161 / Judith Robertson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My objections are as follows:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I strongly object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- The Council has allowed many existing houses, which would be ideal for first time buyers and those with families, to be turned into houses of multiple occupation, in order to house students, who make no contribution to Council Tax, and who are a wholly transient population. The University should be made to house their students in Halls of Residence within the purlieu of its own considerable land holdings, thereby releasing much needed housing stock.
- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.

2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.

3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

7. **Guildford BC has foolishly encouraged the influx of a large and increasing number of “leisure” cyclists into the Horsleys, who block the roads every day of the week, hold up traffic (increasing air pollution) and impede residents from efficiently going about their everyday business.**
   - I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
   - I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
   - I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.
   - I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<table>
<thead>
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<th>Comment ID: pslp172/3736  Respondent: 11168161 / Judith Robertson  Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A35</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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</table>
I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)
4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   - The associated traffic increase from the RHS has not been taken into account.
   - The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account
8. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station
10. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
11. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”
12. Opportunity (3) should be common to all sites and is not unique to this site
13. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
14. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
15. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
16. I object to the removal of additional 3.1 ha from the green belt without any justification
17. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact
18. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.
19. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
20. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.
21. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
22. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.
23. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.
24. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.
25. I object to the extension of the plan period by 1 year as it has not been identified as a major change.
26. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
27. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.
28. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
29. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
30. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

31. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

32. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

33. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

34. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

35. I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development. I particularly object to the reliance on the Carter Jonas study update 2017 which includes “demand” for retail space from companies already administered.

Additionally, the Council has failed to ensure that Surrey University needs to provide student accommodation on its own land, rather than losing valuable, appropriately situated housing stock for Homes of Multiple Occupation, which are the temporary residences of a transient population of students who have no commitment to the communities in which they live, and who make demands on Council services whilst not paying any Council Tax.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6349  Respondent: 11170273 / T Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am a West Horsley resident and lived here for over 32 years.

I very strongly object to policy 52’s proposal on the development of housing in what is deemed ‘Green belt land’

Sir Eric Pickles stated that the imposition of such developments on Green Belt should only be implemented in ‘exceptional circumstances’. The ONS/DCLG figures in para 158 show the proposed increase as well above the agreed target. The area of the ‘Horsleys’ is recognised as Metropolitan Green Belt, incorporating Areas of Outstanding Beauty.

The proposal to build 2000 dwellings will deeply affect:

1. Roads and lanes around the surrounding area within a 5-mile radius which are already badly maintained and not fit for purpose. This increase will exacerbate the problem.

2. Drainage problems which already exist in what is ancient infrastructure and these dwellings can only increase the problem.

3. School places which are already at a premium.
4 The Medical Centre in Horsley which is at capacity as other medical centres including Effingham have shut. The increasing number of elderly and infirm people is putting further pressure on this facility.

5 The railway stations serving this area which have no further capacity to increase car parking.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3461</th>
<th>Respondent: 11170305 / Paul Reynolds</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (north)</td>
<td></td>
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</table>

I live adjacent to Shalford Village Hall on the Common and I am writing to strongly object to the above new version of the Guildford Local Plan. I have written to the Council before but feel I need to make my feelings clear again by objecting to this proposed extension of the village settlement boundary to include the fields behind Shalford Village Hall.

If this land in question is incorporated into the new village settlement boundary, it will lose its green belt and area of great landscape value (AGLV) status.

This would be a huge mistake as the land would then be open to other further development in the future. Due to the height of the land, which is 32 feet above the Kings Road, any development would be clearly seen and tower over the village community facilities and the surrounding area, detracting from the village feeling of space and open character we have at present. These boundaries have been in place for a long time and there is no valid reason for them to change.

We cannot allow the development of 20 houses on these fields with access via Chinthurst Lane. This would create a disastrous traffic situation where we already have considerable congestion and overcrowded village roads. A further 20 houses on this site would potentially mean a further 40 cars (minimum) using the access road on a daily basis, together with visiting cars. This traffic would be in addition to the already heavily congested country lane we have at present.

The lower end of Chinthurst Lane, leading off from Kings Road, is an impossible drive with the continuous parked cars on one side. Further housing development behind Shalford Village Hall would reduce this road to a standstill. Widening the lane, which I understand has also been proposed, would only further degrade our village from retaining its rural character.

I also object to the fact that the infrastructure has not been properly assessed and is inadequate to deal with current housing levels. The local roads in the area, the schools and local amenities will not be able to cope. Development of this site will surely lead to further areas of beauty being scarred forever.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<tr>
<th>Comment ID: PSLPA16/3328</th>
<th>Respondent: 11170369 / Fiona Reynolds</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (north)</td>
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If this land in question is incorporated into the new village settlement boundary, it will lose its green belt and area of great landscape value (AGLV) status. This would be a huge mistake as the land would then be open to other further development in the future. Due to the height of the land, which is 32 feet above the Kings Road, any development would be clearly seen and tower over the village community facilities and the surrounding area, detracting from the village feeling of space and open character we have at present. These boundaries have been in place for a long time and there is no valid reason for them to change. We cannot allow the development of 20 houses on these fields with access via Chinthurst Lane. This would create a disastrous traffic situation where we already have considerable congestion and overcrowded village roads. A further 20 houses on this site would potentially mean a further 40 cars (minimum) using the access road on a daily basis, together with visiting cars. This traffic would be in addition to the already heavily congested country lane we have at present. The lower end of Chinthurst Lane, leading off from Kings Road, is an impossible drive with the continuous parked cars on one side. Further housing development behind Shalford Village Hall would reduce this road to a standstill. Widening the lane, which I understand has also been proposed, would only further degrade our village from retaining its rural character.

I also object to the fact that the infrastructure has not been properly assessed and is inadequate to deal with current housing levels. The local roads in the area, the schools and local amenities will not be able to cope. Development of this site will surely lead to further areas of beauty being scarred forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I believe the proposed boundary change in blue is not correct and it's an accidental mistake. There is a lot of drama surrounding the fields behind the village hall. I think the residents of our part of Christmas Hill have got caught up in this unnecessarily.

The preferred solution would be to leave the boundary unchanged (in red).

As you can see in the map the field at the back of Findon Lodge has changed over time. The garden now extends back the whole way (in between the lime and white lines). The original field would have covered all this area hence the existing red boundary line.

Because of the garden changes I have suggested two alternative boundary lines in lime and white.

The main point here is that the small triangular field needs to remain in green belt please!

Over 700 residents signed a petition objecting to these boundary changes last year.

We live in an area of outstanding natural beauty. Although this small piece of land currently has no intentions of being anything else we need to protect it. You just have to look across to Chinthurst Hill to see how badly this would be affected if something bad were to happen.

If the fields behind the village hall were not up for consideration then I'm sure the boundary near us would not be changing either. It's a very small correction.

I'm happy to show you what I mean from my back garden. I'll throw in a cup of tea too. If you'd like to chat then please do call me on [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998.].

I also want to object to the proposed boundary change to the fields behind the village hall. The big danger here is that the current owner wants to build houses on it.

Over 700 residents signed a petition objecting to these boundary changes last year.

The elevation of this land and where it sits in the village contributing to the open character of the village should be protected.

We live in an area of outstanding beauty. If these fields become less protected then it's such a great shame. I know we need new housing but I think Station Road has given well above the quota needed in our area!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 
ChristmasHillPlan - BoundaryChange.PNG (1.9 MB)
I refer to the land behind the Christmas Hill properties and Shalford Village Hall.

I see that you are proposing to move the green belt boundary to exclude these fields and extend the village boundary to include these fields, making it easier to develop.

I **object** to these changes because:

The elevation of this land is 32 ft above Christmas Hill and Kings Road. Any housing development would tower over the village community facilities and surrounding area including the ancient Shalford Common. Any development would be easily seen from Chinthurst Hill, from the Chanuts and the Downs link national trail.

The land contributes to the open character of the village and provides an attractive setting for the village community facilities.

Access to this land is via Chinthurst Lane, an already heavily congested lane.

Over 700 residents signed a petition objecting to the proposed settlement boundary changes last year. The Parish Council also objects to the boundary changes. As you can imagine the issue has united the local community.

If Guildford Borough Council support the express views of the local residents to protect these fields from development, they should retain them within the current green belt boundary and keep them outside the village settlement boundary.

The boundary has been there for a very long time and should remain in place.

There is no justification for the proposed change.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

| Comment ID: PSLPS16/4481 | Respondent: 11173153 / James Williams | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A38 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Representations on the Proposed Submission Local Plan: Strategy and Sites, June 2016**

**Representations by Thakeham Homes Ltd**

**Site: Land to the west of West Horsley – Policy A38**

Vail Williams have been appointed by Thakeham Homes Ltd to make representations on Guildford Borough Council Regulation 19 Submission Local Plan, June 2016.

These representations focus on Policy A38: Land to the west of West Horsley. The proposed allocation of this site is for residential use (C3) and this is fully supported.

**National Policy & Strategic Policies**
The National Planning Policy Framework (NPPF) contains a presumption in favour of sustainable development, as set out in paragraph 14, and this “golden thread” runs through both plan making and decision taking. For plan making Paragraph 14 states that:

“Local Planning Authorities should positively seek opportunities to meet the development needs of their area” and “local plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change ....”

The second part of paragraph 14 states that, for decision taking, this means:

“Approving development proposals that accord with the development plan without delay ....”

The requirement to deliver sustainable economic development, including homes, businesses and industrial units, infrastructure and thriving local places is further highlighted in Paragraph 17 of the NPPF (Point 3). It is clear there is a significant thrust at national level ‘to boost significantly the supply of housing’ (NPPF para 47.)

The Local Plan polices contained within the GBLP submission document, need to comply with the National Planning Policy Framework (NPPF). The plan must demonstrate that it is positively prepared, justified, effective, and consistent with national policy.

Policy S1: Presumption in favour of sustainable development

Policy S1 (Presumption in favour of sustainable development) within the Submission Plan for Guildford Borough Council reflects the requirement of the NPPF and it is welcomed that the Council will take a positive approach that reflects the presumption in favour of sustainable development. It is also supported that the Council will work proactively with applicants, jointly to find solutions that mean proposals can be approved wherever possible. This is a positive strategic policy within the Local Plan, reflecting national guidance, and it is noted in paragraph 4.1.1 beneath Policy S1 that “Local plans must plan positively to seek opportunities that meet the areas’ objectively assessed development needs and be flexible enough to adapt to rapid change”. Given the plan period of 20 years, the requirement for flexibility within planning policy to respond to changes over a long period is important and should be engrained throughout the plan.

Policy S2: Borough wide strategy

Policy S2 (Borough wide strategy) confirms that the Council will make provision for 13,860 new homes over the plan period (2013/2033). These figures represent the latest evidence gathered through the West Surrey Strategic Housing Market Assessment (SHMA) September 2015. The policy also continues and identifies other requirements for different use classes; including employment floor space.

Along with the overall housing number, Policy S2 contains a table setting out the indicative annual housing split and this runs from the year 2018/19 to 2032/33. The figures contained within the table increase towards the latter part of the Plan period and the policy states this is “reflective of timescales associated with the delivery of strategic sites and infrastructure.”

The total housing numbers identified within the table total 10,395. This is obviously short of the requirement for 13,860; as identified in the opening sentence of Policy S2. However, it is noted that the indicative annual housing targets start in the year 2018, whereas the Plan period runs from 2013. It is considered this is misleading and the table should cover the whole Plan period, including actual completions in the years preceding adoption. This would provide a clearer indicative annual approach demonstrating how the Council are going to deliver the overall housing requirement for the Plan period. This should also incorporate the required flexibility within the housing figures, to ensure that the overall target is met and sufficient flexibility is built into the plan, as required by the NPPF.

As already mentioned the NPPF contains a presumption in favour of sustainable development and flexibility, it is therefore suggested that within the first sentence of Policy S2 that the words “at least” are inserted in relation to the 13,860 new homes. The figure contained within Policy S2 should not be absolute and any further proposals that are sustainable and in accordance with the NPPF and the development plan, should be approved without delay.
Proposed wording for Policy S2: Borough wide strategy

“During the plan period (2013-33), we will make provision for at least 13,860 new homes…

This proposed wording will also facilitate the Duty to Cooperate, allowing the flexibility to contribute to the wider unmet need within the Housing Market Area.

Policy H1: Homes for all

Policy H1 (Homes for all) provides guidance on housing mix and density, along with specialist housing. The Policy is supported in terms of its aim to deliver a wide choice of homes to meet a range of accommodation needs and that development should provide a suitable mix of housing. It is considered important that site specific characteristics are taken into account and this is identified within both the housing mix section and the density section of Policy H1.

With regard to density, the Policy states that “new residential development is required to make the most efficient use of land whilst responding to local character, context and distinctiveness. Residential densities will vary dependent upon the local area, context and character and the sustainability of the location”. This ability to respond through detailed design to local circumstances is supported as it offers flexibility within the planning and design process.

The Local Plan states that it will consist of two parts, with the current document setting out the vision, aims and strategy for the Borough up to 2033 and the second part (Local Plan: Development Management Policies) containing detailed development control policies. This will provide the Council the opportunity to expand upon the key areas identified within Policy H1 in relation to local character, context, distinctiveness and site characteristics.

For the site Land to the west of West Horsley (Policy A38) this provides the flexibility to deliver at least the number of homes (135) identified, with the potential to respond to local character and ‘make the most efficient use of land’ through the detailed design and application stage.

Policy H2: Affordable Homes

National policy seeks to ensure the delivery of “a wide choice” of homes and to “widen opportunities for home ownership” through the creation of “sustainable, inclusive and mixed communities” (NPPF paragraph 50). Along with Policy H1, which contains details on housing mix, Policy H2 (Affordable homes) seeks to provide “sufficient housing to meet the needs of the borough’s population will ensure that the borough thrives, with mixed, balanced communities” (GBC LP 4.2.33).

Whilst a suitable mix of housing is required and supported through national policy, there is still the overriding requirement to “to boost significantly the supply of housing” (NPPF paragraph 47). Any housing policy, including and specifically in relation to affordable housing, needs to ensure effective delivery over the Plan period and also be flexible enough to respond to changing circumstances.

The delivery of housing, especially affordable housing, continues to dramatically alter with various new proposals seeking to increase the delivery of overall housing numbers. A wide range of housing products are available including: starter homes, shared ownership, shared equity, discount market rent, rent to buy, along with market housing and affordable and social rent.

Given the wide range of housing products available and the constantly shifting economic circumstances, it is considered that Policy H2 needs to be flexible and not overly prescriptive to ensure constant housing delivery over the Plan period.

Policy H2 also, in the first bullet point, states that “affordable homes will be provided: on sites providing five or more homes…” The thresholds, for affordable housing, have been regularly challenged and reviewed recently and the proposed policy is, as currently worded, contradictory to national policy including:
Paragraph: 017 Reference ID: 23b-017-20160519, which states: “Are there any exceptions to the 10-unit threshold? Local planning authorities may choose to apply a lower threshold of 5-units or less to development in designated rural areas...” This follows the Court of Appeal decision (May 2016) where the Department for Communities and Local Government won its appeal over a ruling that planning policy for affordable housing requirements on small-scale developments was unlawful.

Proposed wording for Policy H2: Affordable housing

Along with ensuring the threshold reflects the latest legal and national policy situation, we propose the following amendments to ensure adequate flexibility and continuous delivery over the plan period:

“...The tenure and size of affordable homes provided on each qualifying site must contribute, to the Council’s satisfaction, towards meeting the mix of affordable housing needs reflecting local demand and having regard to identified in the Strategic Housing Market Assessment 2015, or subsequent affordable housing needs evidence. This currently includes a tenure split of at least 70% rented, with the remainder being other forms of affordable housing. Affordable rent must be no more than the maximum level set out in our most recent housing guidance or strategy. Developers will be...”

It is also proposed that the following should be added to the policy to ensure deliverability:

“Proposals that are unable to meet affordable housing requirements will be supported by clear viability evidence to establish deliverability.”

Green Belt and Countryside Study

For Policy A38 (Land to the west of West Horsley), the Green Belt and Countryside Study identifies the area (C14) as low sensitivity. The actual site is referenced as C14-C and it concludes that it is a “Potential Development Area (PDA) surrounding villages”. For site A38, it is agreed that the site is suitable for residential development and it should be inset from the Green Belt.

Land to the west of West Horsley: Land Availability Assessment

The site is identified within the Land Availability Assessment (LAA) site reference 15. The LAA identifies the site to be “located between Bens Wood Nature Reserve (non-statutory) to the north, Northcote Road to the east, East Lane to the south, and Long Reach to the west”. It terms of site character the LAA concludes “the site is physically and visually enclosed by a local undulation, hedgerows and existing residential development”. The site is adjacent to existing roads and vehicular access can be provided.

The LAA identifies that there is a Grade II listed building on site (Manor Farm House), which will need to be preserved as part of any new development. This requirement is recognised and endorsed.

The proposed development will require the provision of Suitable Alternative Natural Greenspace (SANG) and bespoke SANG will be provided (as detailed below).

It is confirmed that the site and the proposed SANG is under the control of Thakeham Homes Ltd and is immediately available and achievable for residential development. The site is capable of providing at least the 135 residential units (C3) as proposed in the allocation Policy A38.

Attached as part of these representations is a Concept Plan (BMD 14.023.DR.001A) that demonstrates the site is capable of achieving a high quality layout, respecting the listed building and character of the surrounding area, whilst delivering the housing units required in Policy A38. The site boundary includes the bespoke SANG provision to the north and illustrates the proposed access roads from both Long Reach road and East Lane. The overarching conclusions of the LAA assessment, for this site, are supported.
Infrastructure Delivery Plan (IDP)

As mentioned above, the site is required to provide SANG and details are contained with the IDP 2016. Specifically for Land at Manor Farm East Lane, West Horsley, (Policy A38), paragraph 4.23 states that: “we expect the developers of the following sites to deliver bespoke SANGs to mitigate their own developments… Land at Manor Farm East Lane…”

The attached Concept Plan (BMD 14.023.DR.001A), encompasses the whole site including the provision of SANG as required by policy and detailed in the IDP. Thakeham Homes confirm that the site is available and deliverable for residential (C3) development including the provision of bespoke SANG as detailed on the attached Concept Plan.

Policy A38: Land to the west of West Horsley

Having considered the National and Strategic Policies requiring housing development, the proposed allocation A28 identifies requirements (including the listed building and SANG) and opportunities (green corridors and links to the SANG) for the site. The attached Concept Plan (BMD 14.023.DR.001A) demonstrates the site is capable of accommodating at least 135 residential units whilst respecting local heritage and providing, including links to, the bespoke SANG provision to the north.

In conclusion, the site is available for development, is being actively promoted by Thakeham Homes, and there are no overriding site constraints. The attached Concept Plan demonstrates that detailed design is able to respond to site specific characteristics and also provide bespoke SANG. There are no overarching policy or site specific reasons why the site should not be allocated for residential (C3) use in accordance with Policy A38.

The site is available, achievable, and deliverable within the short term and will enable the delivery of much needed housing within the early part of the plan period. The proposed allocation, through Policy A38, of the land to the wets of West Horsley, is fully supported.

Summary and Conclusion

The site (A38) is available and suitable for residential development of at least the 135 (C3) units identified in policy. There is single developer interest, Thakeham Homes, so the site can be quickly progressed and deliver much needed homes early in the plan period. There are no significant infrastructure requirements that would preclude development and the provision of bespoke SANG is achievable; as demonstrated on the attached Concept Plan.

The proposed allocation of Land to the west of West Horsley (Policy A38) is fully supported. It is in the ownership of two supportive landowners who wish to work jointly with Thakeham Homes to provide at least 135 residential units, contributing to the housing requirement early in the plan period.

Examination

Given the importance placed on housing delivery at a national level and within the Guildford Local Plan, and the comments within this representation, we wish to express our desire to appear at examination and attend any pre-examination meetings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: West Horsley BMD.14.023.DR.001A Concept Plan.pdf (365 KB)
Reps Guildford LP Manor Farm West Horsley July 2016.pdf (398 KB)
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the new version of the Guildford Local Plan, specifically in regard to protection of the fields behind Shalford Village Hall. GBC should support the expressed views of the local residents to protect the fields from development, retaining them within the current green belt boundary and keeping them outside the village settlement boundary. The boundaries have been there for a long time and there is no valid reason for change. The fields behind Shalford Village Hall contributes to the open character of the village and provides an attractive setting for the village's community facilities. Further the elevation of this land, which is 32 feet above Kings Road, is the highest in the local area and any housing development built on it would tower over the village community facilities and surrounding area. Finally, with access to this land being via Chinthurst Lane this would further add to an already heavily congested country lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPP16/1156</th>
<th>Respondent: 11173985 / Peter Thurston</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to your current proposal of the proposed boundary change next to Shalford village hall:

- Due to their height, these fields contribute to the openness of the Green Belt and any development would be clearly visible from the Village Green. They rise over 32 feet above Kings Road and over 25 feet above the Village Hall.
- These fields contribute to the open character of the village and provide a rural backdrop.
- This land is currently within the Green Belt and AGLV and will lose it’s protected status if it is altered to fall within the new settlement boundary
- Very large developments are already planned both sides of the village so is it really worth spoiling the heart of Shalford by building on this virgin, totally undeveloped site?
- Aerial maps which are being used to help draw the new settlement boundary don’t take into account the particularly high elevation of this land and its protected status.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/1696</th>
<th>Respondent: 11182081 / Robert Jones</th>
<th>Agent: Kiely Planning Limited (Colin Kiely)</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Chilworth</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Proposed Submission Local Plan Strategy and Sites June 2016

We are instructed by Mr R Jones to submit the enclosed response to the Proposed Submission Local Plan. This representation relates specifically to the proposed settlement boundary to Chilworth with particular reference to the boundary in the vicinity of Tangley Mere (see plan extract below). We believe that the land outlined on the enclosed plan and shown below in the context of the settlement should be included within the defined boundary and thus removed from the Green Belt.

[TANGLEY MERE]

Tangley Mere is a large detached house situated in extensive grounds located on the south side of New Road. As can be seen from the enclosed Ordnance Survey there is a notable gap in development along the south of the Road. We consider this ‘open frontage’ to New Road should be included within the settlement boundary of Chilworth, thus enabling its future development.

In terms of the principle of additional development within Chilworth, as confirmed by the Settlement Profiles Study July 2013:

“Chilworth has a number of key community services and facilities which makes it one of the more sustainable villages. Subject to suitable sites being available, there is scope for a rural exception site to provide affordable homes for local people and potential for an extension to the village.”

(see Page 18)

Advice regarding the definition of Green Belt boundaries is set out at Paragraph 85 of the NPPF that states:

When defining boundaries, local planning authorities should:

- ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- not include land which it is unnecessary to keep permanently open;
- where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;
- satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

In relation to the above, the Local Planning Authority has confirmed that the settlement of Chilworth is sustainable and can accommodate additional housing in a manner consistent with the NPPF. In addition we see no reason why the land, the subject of this representation, is necessary to keep permanently open. Finally, the proposed alteration of the Green Belt boundary sought would retain a clear, defensible boundary. As can be seen from the OS plan, the site is bounded by a large pond to the east which would provide a clear defensible boundary.

- With respect of whether it is necessary to keep the land ‘open’ we consider the impact of development on the five purposes of the Green Belt below and conclude:
- It would maintain the separation of between to Blackheath (to the south) and Albury (to the east)
• It would not conflict with the need to safeguard the countryside from encroachment. In this regard the land beyond the site would continue to form part of the Green Belt where future development (in a manner that conflicts with the purposes of the Green Belt) would be prevented.
• Would not harm the setting of Chilworth.

Finally, it is accepted that the development of the site is constrained by mature trees and vegetation, however we consider this will assist in ensuring that any future development is of a low density maintaining a sylvan setting thus ensuring no harm arises to the character and appearance of the site or surrounding area. Furthermore, the Council have policies in place to ensure that any future development is satisfactory in relation other matters of planning importance including impact on the landscape. These considerations would need to be considered in relation to any future planning application.

We trust you will take the above comments into consideration and should you require any further information please do not hesitate to contact us.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  📁 IMAGE 1.png (298 KB)
<table>
<thead>
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<th>Comment ID: PSLPS16/7305</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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I object to this development on the Wey flood plain. Further development in this location will increase the likelihood of flooding and also increase traffic levels on Tannery and Papercourt lanes which are single track country lanes.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<table>
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<tr>
<th>Comment ID: PSLPS16/7306</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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I object to this proposed development on existing green belt, its siting by the A3 will expose residents to noise and poor air quality from the A3.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<table>
<thead>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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</table>

I object to this development on green belt land, Ripley has absorbed many new dwellings over the last few years, this is now starting to create severe parking problems for residents and visitors reducing the attraction of the village and potentially damaging the existing businesses.

I will be happy to provide any further details about my objections to the Draft Plan and hope that consideration will be given to the points raised.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
<table>
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<td></td>
<td>• Removal of attractive, thriving villages from the green belt including Ripley, Send, West Clandon creating the prospect of an urban sprawl merging with Woking particularly when developments in that Borough are taken into consideration.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td></td>
<td>• Flooding is endemic in the area of north Surrey, further developments adjacent to flood plains for example site A42 Clockbarn Nursery will create further flooding issues both for the new developments and existing properties. The lessons of developments on flood plains should be learnt.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- Local roads are already overwhelmed by rush hour traffic; in the north of the borough in particular the current traffic volumes on commuter routes which are often country lanes are creating long queues through village centres such as Ripley and Send, impacting on the quality of life including the exposure to harmful levels of vehicle emissions.
- Rail services into London where many of the new residents are likely to work are already at or above capacity. The fast services from Woking will be chosen by many commuters living in the new properties planned for Wisley site A35, Garlick’s Arch A43 and those to the east of the A3. This will cause further traffic issues through the villages en-route to Woking.
- Bus services are currently inadequate, slow, declining in number and due in part to the traffic issues above are totally unsuitable to be promoted as an alternative for commuters in the villages outside of Guildford.
- Active travel in the villages will in the main be cycling, this is not an attractive alternative due to the narrow country lanes which cyclists would need to travel on en-route to local stations. Currently cyclists on these commuter routes increase congestion as it is not possible for cars and commercial vehicles to safely overtake them; unless proper provision is created then this is not a sustainable alternative.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3236  Respondent: 11182849 / Ian Featherstone  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 1/3rd increase in housing from 45 (already unsustainable ) to 60. It will create traffic chaos in Tannery and Papercourt Lanes and is likely to lead to an increase in head-on collisions in these single track roads which are already too frequent. The adjacent water meadows on the flood plain just cope with current rainfall; this development could cause flooding several times a year both at the site itself and to all properties which currently lie at the edge of the flood zone.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3239  Respondent: 11182849 / Ian Featherstone  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this site being included as well as Garlicks Arch, again this generates yet more congestion and pollution in this area. There is no need to build industrial or warehouse development in the middle of the green belt as Slyford and Guildford have empty sites and industrial units. Indeed one of the successes of Guildford in recent years has been in digital technology developments, it is unlikely that there will be a need for a large increase in the number of industrial units in the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1526  Respondent: 11182849 / Ian Featherstone  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to GBC using amended housing figures (SHMA) based on a flawed housing study which has attracted widespread criticism. I object to GBC making amendments without adhering to the government’s NPPF rules “to assist in urban regeneration, by encouraging the recycling of derelict and other urban land”. (NPPF, Section 9, para 80). I object to the amended plan ignoring the government’s NPPF guidelines - “……. local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary”. I object to GBC amending all of the large Green Belt sites and including large Green Belt sites throughout the borough for housing instead of proposing housing in every village and town, on a proportional basis, to meet local needs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3785  Respondent: 11183809 / Robinson Escott Planning LLP (Joe Alderman)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We act for Crimson Project Management. This representation relates to the

INFRASTRUCTURE AND DELIVERY - Policy 11 and INFRASTRUCTURE SCHEDULE - Appendix C.

The Consultation Draft Guildford Borough Local Plan July 2014 identified a need for a new five form entry secondary school to the north of Guildford. A site for the school was proposed to be allocated at Salt Box Road, Guildford.

The Regulation 19 Submission Draft has deleted this proposed allocation. Instead, Item SED3 of Appendix C identifies a seven form entry secondary school allocation at a strategic site at Normandy/Flexford. The proposed new secondary school is to be located close to Wanborough Railway Station. It is stated that only one form of entry would be required to serve the strategic development itself, with the remaining capacity serving the wider area, including the Blackwell Farm strategic site.

Crimson Project Management has recently submitted a planning application for a mixed use development which would include a new five form entry secondary school as part of a sustainable urban extension to Fairlands which is in a significantly more sustainable location to serve the needs of north Guildford, the wider area and any further development that may take place at Blackwell Farm and/or Normandy/Flexford.

Attached to this letter is a comparative analysis of the sustainability merits of the respective proposed locations for both the new school and new housing of the Rokers/Fairlands development and the Normandy/Flexford development. The conclusions of the analysis demonstrate that the Rokers/Fairlands site is a significantly more sustainable location for the new secondary school than Normandy/Flexford.

The results of the analysis show that a substantial portion of the catchment for the new school would be from northern Guildford. In those circumstances, the proximity of Wanborough Station to the Normandy/Flexford site would be of little or no benefit in that pupils would need to travel into central Guildford to get the train back out. Equally, for those pupils travelling on the KITE service, it would make no sense for them to have to travel past the Rokers site on the A323 for several miles to get to the Normandy/Flexford school site.

The Infrastructure Schedule contained at Appendix C should be amended, therefore, to include provision of a new five form entry secondary school on the Rokers site as part of a new mixed use development to include housing, community uses and sporting facilities.

Transport Planning & Infrastructure Ltd has been instructed by Crimson Project Management Ltd to prepare Transport Representations in respect of the Guildford Borough Council Proposed Submission Local Plan.

These transport representation focus on the exclusion of the Rokers site at Fairlands Farm, Holly Lane from the Draft Local Plan and seek to justify its The site is currently subject to an outline planning application (reference 16/P/01397) for the construction of up to 370 residential dwellings and a new school/educational facility.

In addition, these representations seek to provide a comparison of the Rokers site against the Normandy/Flexford allocated site A46, demonstrating how the Rokers site benefits from being located in a more sustainable location than Normandy/ Flexford.

Location

This site is located to the south of Normandy, linking the villages of Flexford and It is located within a parcel of land, broadly bound by the A323 Guildford Road to the north, the Guildford - Ash railway line to the south, Westwood Lane to the west and Glaziers Lane to the east. It should be noted that the allocated site does not comprise all of this area, though these broad boundaries constrain the site location. The portion of land is reduced due to residential properties being located along Glaziers Lane, which are outside of the site ownership boundary.

Local Highway Network

The following paragraphs provide a description of the key local roads in the vicinity of the site.
A323 Guildford Road

- The A323 is part of the distributor road network, linking Guildford to the east with Ash and Aldershot to the west. The A323 is a single carriageway road along its length, with a 30 miles per hour speed limit along the length of the road. The speed varies between 30 mph and 40 mph to the west of the site, and includes a section of 50 mph carriageway to the east of Normandy.

- The A323 is subject to high traffic flows, especially in the peak hours. The route represents a key route into Guildford, avoiding the A3 or A31.

Pedestrian footways are located along the southern side of the A323 carriageway through Normandy in the vicinity of the site.

Westwood Lane

- Westwood Lane is a 'C' class route (C16) providing a link on a predominantly north south axis between Normandy and the A31 to the south, in Flexford.

- Westwood Lane is subject to a 30 mile per hour speed limit through Flexford, with sections subject to a 40 mph speed limit to the north and south of Flexford.

- The route is subject to a width and height restriction by way of a bridge under the railway line, which restricts vehicles below 14 feet and 3 inches. This bridge is also restricted to a single lane of traffic, with priority given to southbound traffic movements.

- Pedestrian footways are provided on both sides of the carriageway through Flexford, with only one footway provided between Flexford and Normandy, along the eastern side of the carriageway.

Glaziers Lane

- Glaziers Lane is subject to a 30 mile per hour speed limit, and routes from the A323 in Normandy to Westwood Lane in Flexford, via Wanborough railway. This road is unclassified (060), and is lightly trafficked.

Along the northern section of Glaziers Lane, between the A323 and Normandy Village Hall, footways are provided along both sides of the carriageway. To the south, footways are provided on one side of the carriageway, with the footpath alternating each side of the carriageway on numerous occasions.

Proximity to Bus Services

- The A323 Guildford Road is a bus corridor for the frequent KITE service, linking Guildford and Aldershot at 15 minute intervals in each direction.

- This service would be accessible to the northern portion of the Flexford/Normandy site, with bus stops located in the vicinity of the Guildford Road/Westwood Lane/School Lane crossroads junction and in the vicinity of the Guildford Road/Glaziers Lane/Hunts Hill Road crossroad. Figure 1 provides an indication of the extent of the site that can access these bus stops based on a 400 metre walk distance using the existing road and footpath network. This Figure indicates that only a minimal portion of the site is accessible by bus.

- Additional bus services route along Westwood Lane and Glaziers Lane, with the PT5 bus providing a link to St Peters School in the morning and An additional school service, the 694, operates towards Broadwater School.

- The 520 bus service is a variation of the KITE bus service, which includes a loop along Westwood Lane and Glaziers. The timetable for this service is included at Appendix A; there are just two services operating daily towards Guildford and Woking (Woking service operates on Wednesday only), and four services operating (reduces to three on Wednesdays) towards Aldershot.

Proximity to Rail Services
• The site is located immediately north of the Guildford - Ash railway line, with Wanborough railway station located in the south eastern corner of the A summary of services available from this station is provided in Table 1 below.

<table>
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<th>Service</th>
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<th>I PM Peak</th>
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<tr>
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<td>Guildford</td>
<td>Half Hourly</td>
<td>Half Hourly</td>
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<tr>
<td>Redhill</td>
<td>Guildford - Shalford (Surrey) - Chilworth - Gomshall - Dorking West - Dorking Deepdene - Betchworth - Reigate - Redhill</td>
<td>No Direct Service</td>
<td>Hourly</td>
</tr>
<tr>
<td>Ascot (Berks)</td>
<td>Ash - Aldershot - Ash Vale - Frimley - Camberley - Bagshot - Ascot (Berks)</td>
<td>Half Hourly</td>
<td>Half Hourly</td>
</tr>
<tr>
<td>Reading</td>
<td>Ash - North Camp - Farnborough North - Blackwater - Sandhurst (Berks) - Crowthorne - Wokingham - Reading</td>
<td>Hourly</td>
<td>No Direct Service</td>
</tr>
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</table>

Table 1 indicates that Wanborough station is served by three rail services routing westbound in the weekday morning peak hour and two services routing in the weekday evening peak hour, three services route eastbound and two services route westbound.

• Summary
  - To summarise the accessibility of the site, Figure 2 provides a public transport travel time plan from the site, highlighting areas that are accessible within 15, 30 and 60 minutes' public transport travel time. This Figure is produced based on public transport options available between 07:00 and 09:00 on a weekday.
  - This Figure indicates that Guildford town centre, in the vicinity of the bus and train stations, is accessible within a 30 minutes' travel time from the site. However, the majority of locations surrounding Guildford are located within 60 minutes' travel.

**ROKERS SITE**

- The Rokers site has been excluded from the Proposed Submission Local Plan, but is subject to a live planning application (reference 16/P/01397). This application seeks outline planning permission for:
  - Up to 370 residential dwellings;
  - A new school/education facility (proposed at this stage to be a secondary school);
  - A new community hub with children's nursery, community offices, children's play centre and commercial units;
  - Highway improvements to the A323;
  - Landscaped open space; and
  - A provision of SANGS

With this application being a live planning application, it would be considered that if this application is approved, a school at the Normandy/Flexford site would not be required.
The Rokers site was put forward for inclusion within the Local Plan, but has not been suggested as a draft allocation by the Council. In terms of location and accessibility, it is considered that the Rokers site represents a more sustainable location for a school and residential development than others suggested in the plan.

**Location**

The Rokers site is located on the eastern side of the A323 Aldershot Road, to the east of Fairlands Village. The site is bound to the north-west by Holly Lane, a link between the A323 Aldershot Road and the A322 Worplesdon Road, and to the west by the A323 Aldershot Road.

- Merrist Wood College is located to the north-west of the site, across Holly Lane. The Rokers site therefore provides the potential for an educational hub to be created in the area, with a bus interchange facility provided within the application site to enable bus services to serve both educational sites.

**Local Highway Network**

- A description of the key vehicle routes in the vicinity of the application site is provided in the following paragraphs. Where relevant, reference is made to a number of automatic traffic counters (ATC) that have been placed on the carriageway in order to record traffic volumes by Each ATC recorded data for a 7-day period between 1st and 7th March 2016.

**A323 Aldershot Road**

- The A323 Aldershot Road routes on a north-west to south-east axis along the site. At the roundabout junction with Holly Lane, the A323 routes west towards Aldershot. The A323 is an important transport corridor as a county distributor road providing access between Guildford and Aldershot and to the A331 in the vicinity of Ash.

Along the site frontage, the A323 Aldershot Road is subject to a 40 miles per hour speed limit with a pedestrian footway provided along the eastern side of the carriageway. Through the residential areas within the Guildford boundary, Aldershot Road is subject to a 30 mph speed limit and has footways along both sides of the carriageway.

An ATC placed along the A323 between the Holly Lane roundabout junction and Fairlands access junction recorded a two-way average annual daily traffic flow (AADT) of 13,109. This was split 52% westbound/48% eastbound.

**Holly Lane**

- Holly Lane routes on a north-east to south-west axis to the north-west of the Holly Lane is subject to a 40 miles per hour speed limit and has a shared foot and cycleway along the southern side of the carriageway. This shared foot/cycleway extends along the existing Rakers access road onto Aldershot Road.

An ATC placed along Holly Lane between the existing Rakers access and the Worplesdon Road roundabout junction recorded AADT traffic flows of 10,325 vehicles. This traffic is evenly distributed, 50%/50% between north east and south west bound vehicle movements.

**Accessibility to Existing Infrastructure**

**Proximity to Bus Services**

The KITE service routes along the A323 in the vicinity of the site, with services provided between Guildford and Aldershot hot at 15 minute intervals.

- The closest bus stops to the site are located in the vicinity of the Fairlands Avenue/A323 Aldershot Road priority junction, with the bus stop for northbound services located to the north of the junction and the southbound bus stop located to the south of this.
• Figure 3 provides a 400 metre walking isochrone to indicate areas that are located within 400 metres walk of these bus Figure 3 indicates that the majority of the site is accessible within 400 metres walk, based on the existing infrastructure and walking routes, with only the corners of the site located outside of this walk distance.

In comparison, only a small portion of the Normandy/Flexford site is located within walking distance of a bus stop servicing the frequent KITE service, indicating that the Rakers site is more accessible by bus services based on existing infrastructure. This is beneficial as it negates the need for any re-routing of existing bus services or any new bus services to be created, instead increasing the patronage on the profitable KITE service.

In addition, the 17 service provides additional services between Fairlands and Guildford, though less frequent than the

Proximity to Rail Services

• Whilst the nearest railway station to the site is Worplesdon station, the easiest station to access from the site is Guildford railway The KITE service can be used to access Guildford town centre, with no public transport links available to Worplesdon station.

• Worplesdon station is located on the mainline London Waterloo - Portsmouth railway line and is served every 20 minutes towards London Waterloo and half hourly towards Haslemere and Portsmouth in the weekday morning peak hour. During the evening peak hour, services operate every 20 minutes towards Haslemere and Portsmouth and half hourly to London Waterloo

Guildford railway station is located on the North Downs Line, in addition to the London Waterloo mainline, providing additional services between Reading and Gatwick Airport. Table 2 below summarises the rail services accessible from Guildford station.

<see attachments for table 2>

• Table 2 indicates that Guildford station is well served by rail services, especially in comparison to Wanborough station served by the Flexford/Normandy

Summary

• To summarise the accessibility of the Rokers site, Figure 4 provides public transport travel time isochrones detailing areas that are accessible within 15, 30 and 60 minutes' travel time from the It should be noted that Guildford town centre is accessible within a 30-minute travel time from the site, with Woking also accessible within this timeframe.

RESIDENTIAL AND SCHOOL COMPARISON

Whilst the above sections detail information on the location and accessibility of the two potential sites, this section will provide more of a direct comparison in respect of access by public transport for the residential and school aspects of each

Residential Accessibility

• For the residential development, accessibility to the local towns is vital, as these are the areas where the majority of residents will work and head for shopping and leisure trips.

• Figures 2 and 4 provide travel time isochrones from each site and enable the allocated Flexford/Normandy site and the proposed Rokers site to be directly

• Figure 2 indicates that the Flexford/Normandy site enables Ash, Wanborough station and Fairlands to be accessed within 15 minutes' travel time from the site In comparison, Figure 4 indicates that Guildford bus station is accessible within 15 minutes' travel from the Rokers site, along with Ash railway station, and sections along the A323 and A322 Worplesdon Road.
• In terms of accessibility to local towns, Figure 4 indicates that the Rakers site can access much of Guildford town centre within 30 minutes' travel time, along with Ash and a section of Aldershot. In addition, areas of Mayford are also accessible within a 30 minutes' travel time from the site. Woking is accessible within 60 minutes' travel time alongside Godalming, Farnham, Farnborough and areas to the south of Guildford.

In contrast, Figure 2 indicates that the Flexford/Normandy site can access Ash within 15 minutes, and sections of Aldershot and Guildford within 30 minutes' travel time. Within 60 minutes' travel, Woking, Farnborough, Godalming and areas to the south and east of Guildford are accessible.

• To compare the two locations, the areas accessible within a 60-minute travel time are broadly similar, as expected from the relatively short distance between the sites along the The key difference between the sites is the proximity to Guildford town centre, with Rakers accessible to the majority of the town centre within 30 minutes and the bus station within 15 minutes. This indicates that the Rakers site is more sustainably located to residents commuting to work by sustainable modes, with more key locations located within a shorter commuting distance.

School Accessibility

• To assess the accessibility of the school, assumptions need to be made regarding the likely school catchment. This information is not publically accessible, and therefore assumptions have been based on existing school catchment areas and the stated need for a school to the north and west of Guildford.

• As the Rakers site has already been submitted as a planning application, this comparative assessment will make use of the assumptions undertaken within the Transport Assessment for this development. This utilised a gravity model approach to assess the likely school catchment.

• It is assumed that demand for school places would be mostly driven from northern Guildford and surrounding rural area locations towards Ash and Aldershot and north to Mayford and given the difference in residential population between Ash and Guildford, the majority of students are expected to come from the north Guildford area.

• By assessing the locations of the nearest secondary schools to the site and their indicative catchment based on school acceptance criteria for distance from the school, it can be seen that Ash is served by Ash Manor. The north west area of Guildford is served only by small school catchments in Bellfields (Christ's College) and Park Barn (King's College). On this basis, a 65% to 10% split will be assessed between Guildford and Ash for the purposes of this gravity model, with the remaining trips from the outlying areas between Ash and Guildford.

• Census data relating to the number of children per ward has been investigated to provide a more detailed gravity model, with Figure 6.6 of the Transport Assessment included at Appendix B providing the gravity model plan used within this. This indicates that the north Guildford area, and in particular the wards of Westborough, Stoughton and Stoke would represent the key catchment area for the school.

• Figures 2 and 4 provide an indication of the likely travel times from each site in the weekday morning peak hour and these provide an indication of the accessibility of the school catchment area to each.

Figure 2 indicates that Westborough ward and a portion of the Stoughton ward are accessible within 30 minutes' travel time from the Flexford/Normandy site, whilst the whole catchment is accessible within a 60 minutes' travel time. Figure 4 indicates that the Rakers site can access portions of the Westborough and Stoughton wards in 15 minutes, with the entirety of these wards and a portion of the Stoke ward accessible within 30 minutes' travel time to the Rakers site. Again, as with the Flexford/Normandy site, the full catchment is located within a 60 minutes' travel time of the site.

• In terms of accessibility towards Ash and the outlying areas, there is little difference between the two sites, with a large part of the outlying areas accessible within 15 minutes' travel. Ash railway station is accessible within 15 minutes' travel time with the remainder of Ash accessible within 30 minutes of the Rokers site. In comparison, the Flexford/Normandy site provides access to a larger area of Ash within a 30 minutes' travel time, with areas along the route to Aldershot more accessible.
• In it can be seen that the Rokers site represents a more sustainable location for the school based on its proximity to the residential areas.

Summary

• In summary, it is considered that the Rokers site is clearly better in terms of accessibility and location to the Flexford/Normandy allocated. This is due to key areas including the potential school catchment area and workplace areas within Guildford being more accessible from the site, with larger areas accessible within a 15 and 30-minute travel time from the site.

• SUMMARY AND CONCLUSION

  ◦ Transport Planning & Infrastructure Ltd has been instructed by Crimson Project Management Ltd to prepare these Transport Representations against the Guildford Borough Council Proposed Submission Local.
  ◦ These representations provide a comparison between the Flexford/Normandy allocated site and the Rokers. The Flexford/Normandy site is included as allocation A46, with the Rokers site excluded from the Proposed Submission Local Plan.
  ◦ The Rokers site is subject to a live planning application for an educational facility and residential development on land to the east of Fairlands.
  ◦ In summary, these representations have identified that the Rokers site is ideally located to key infrastructure, with the majority of the site located within a 400 metre walk distance to the frequent KITE bus. In contrast, the Flexford/Normandy site is poorly located to existing public transport infrastructure, despite the location of Wanborough station in the south eastern corner of the site.
  ◦ In terms of accessibility, the Rokers site is more conveniently located in terms of travel times to local towns and the potential school catchment area, with more key areas accessible within 15 and 30 minutes' travel time compared to the Flexford/Normandy.

On this basis, it is considered that the Rokers site provides a significantly more sustainable location for an educational facility and residential development than the draft allocations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [POLICY I1 & APPX C_20160715133341.pdf](#) (1.6 MB)

Comment ID: PSLPS16/7138  Respondent: 11183809 / Robinson Escott Planning LLP (Joe Alderman)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We act for Crimson Project Management. This representation relates to the TABLE 1- Policy S2 and Policy A35 concerning LAND AT FORMER WISLEY AIR FIELD, OCKHAM.

The proposed allocation of land at Wisley for a new settlement would be incompatible with the Council's decision to refuse planning permission for this new settlement on grounds which, inter alia, seemingly go to the principle of building a new settlement at this location.

The proposed settlement is in an unsustainable location having regard to its geographical relationship to any district or local centres or other significant areas of population and is in an unsustainable location in respect of public transport access. Its
location would appear to be dependent upon its relationship to the adjacent motorway and strategic road network which undoubtedly will provide the stimulus for encouraging travel by the private car on already busy roads.

There are more sustainable locations for new housing development in the Borough than Wisley airfield.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents: [TABLE 1 POLICY S2 & A35_20160715133228.pdf](#) (65 KB)

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**Comment ID:** PSLPS16/7139  **Respondent:** 11183809 / Robinson Escott Planning LLP (Joe Alderman)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please find attached letter in respect of the above relating to Land to the south of Normandy and North of Flexford – Policy A46

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents: [POLICY A46_20160715133244.pdf](#) (1.7 MB)

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**Comment ID:** PSLPP16/15987  **Respondent:** 11183809 / Robinson Escott Planning LLP (Joe Alderman)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We act for Crimson Project Management. This representation relates to the

**INFRASTRUCTURE AND DELIVERY - Policy 11 and INFRASTRUCTURE SCHEDULE - Appendix C.**

The Consultation Draft Guildford Borough Local Plan July 2014 identified a need for a new five form entry secondary school to the north of Guildford. A site for the school was proposed to be allocated at Salt Box Road, Guildford.

The Regulation 19 Submission Draft has deleted this proposed allocation. Instead, Item SED3 of Appendix C identifies a seven form entry secondary school allocation at a strategic site at Normandy/Flexford. The proposed new secondary school is to be located close to Wanborough Railway Station. It is stated that only one form of entry would be required to serve the strategic development itself, with the remaining capacity serving the wider area, including the Blackwell Farm strategic site.
Crimson Project Management has recently submitted a planning application for a mixed use development which would include a new five form entry secondary school as part of a sustainable urban extension to Fairlands which is in a significantly more sustainable location to serve the needs of north Guildford, the wider area and any further development that may take place at Blackwell Farm and/or Normandy/Flexford.

Attached to this letter is a comparative analysis of the sustainability merits of the respective proposed locations for both the new school and new housing of the Rokers/Fairlands development and the Normandy/Flexford development. The conclusions of the analysis demonstrate that the Rokers/Fairlands site is a significantly more sustainable location for the new secondary school than Normandy/Flexford.

The results of the analysis show that a substantial portion of the catchment for the new school would be from northern Guildford. In those circumstances, the proximity of Wanborough Station to the Normandy/Flexford site would be of little or no benefit in that pupils would need to travel into central Guildford to get the train back out. Equally, for those pupils travelling on the KITE service, it would make no sense for them to have to travel past the Rokers site on the A323 for several miles to get to the Normandy/Flexford school site.

The Infrastructure Schedule contained at Appendix C should be amended, therefore, to include provision of a new five form entry secondary school on the Rokers site as part of a new mixed use development to include housing, community uses and sporting facilities.

Transport Planning & Infrastructure Ltd has been instructed by Crimson Project Management Ltd to prepare Transport Representations in respect of the Guildford Borough Council Proposed Submission Local Plan.

These transport representation focus on the exclusion of the Rokers site at Fairlands Farm, Holly Lane from the Draft Local Plan and seek to justify its The site is currently subject to an outline planning application (reference 16/P/01397) for the construction of up to 370 residential dwellings and a new school/educational facility.

In addition, these representations seek to provide a comparison of the Rokers site against the Normandy/Flexford allocated site A46, demonstrating how the Rokers site benefits from being located in a more sustainable location than Normandy/Flexford.

Location

This site is located to the south of Normandy, linking the villages of Flexford and It is located within a parcel of land, broadly bound by the A323 Guildford Road to the north, the Guildford - Ash railway line to the south, Westwood Lane to the west and Glaziers Lane to the east. It should be noted that the allocated site does not comprise all of this area, though these broad boundaries constrain the site location. The portion of land is reduced due to residential properties being located along Glaziers Lane, which are outside of the site ownership boundary.

Local Highway Network

The following paragraphs provide a description of the key local roads in the vicinity of the site.

A323 Guildford Road

- The A323 is part of the distributor road network, linking Guildford to the east with Ash and Aldershot to the The A323 is a single carriageway road along its length, with a 30 miles per hour speed limit along the length of the A323 through Normandy. The speed varies between 30 mph and 40 mph to the west of the site, and includes a section of 60mph carriageway to the east of Normandy.

- The A323 is subject to high traffic flows, especially in the peak The route represents a key route into Guildford, avoiding the A3 or A31.

Pedestrian footways are located along the southern side of the A323 carriageway through Normandy in the vicinity of the site.

Westwood Lane
• Westwood Lane is a 'C' class route (C16) providing a link on a predominantly north south axis between Normandy and the A31 to the south, in

• Westwood Lane is subject to a 30 mile per hour speed limit through Flexford, with sections subject to a 40 mph speed limit to the north and south of

• The route is subject to a width and height restriction by way of a bridge under the railway line, which restricts vehicles below 14 feet and 3 inches This bridge is also restricted to a single lane of traffic, with priority given to southbound traffic movements.

• Pedestrian footways are provided on both sides of the carriageway through Flexford, with only one footway provided between Flexford and Normandy, along the eastern side of the carriageway.

**Glaziers Lane**

• Glaziers Lane is subject to a 30 mile per hour speed limit, and routes from the A323 in Normandy to Westwood Lane in Flexford, via Wanborough railway This road is unclassified (060), and is lightly trafficked.

Along the northern section of Glaziers Lane, between the A323 and Normandy Village Hall, footways are provided along both sides of the carriageway. To the south, footways are provided on one side of the carriageway, with the footpath altering each side of the carriageway on numerous occasions.

**Proximity to Bus Services**

• The A323 Guildford Road is a bus corridor for the frequent KITE service, linking Guildford and Aldershot at 15 minute intervals in each

• This service would be accessible to the northern portion of the Flexford/Normandy site, with bus stops located in the vicinity of the Guildford Road/Westwood Lane/School Lane crossroads junction and in the vicinity of the Guildford Road/Glaziers Lane/Hunts Hill Road crossroad Figure 1 provides an indication of the extent of the site that can access these bus stops based on a 400 metre walk distance using the existing road and footpath network. This Figure indicates that only a minimal portion of the site is accessible by bus.

• Additional bus services route along Westwood Lane and Glaziers Lane, with the PT5 bus providing a link to St Peters School in the morning and An additional school service, the 694, operates towards Broadwater School.

• The 520 bus service is a variation of the KITE bus service, which includes a loop along Westwood Lane and Glaziers The timetable for this service is included at Appendix A; there are just two services operating daily towards Guildford and Woking (Woking service operates on Wednesday only), and four services operating (reduces to three on Wednesdays) towards Aldershot.

**Proximity to Rail Services**

• The site is located immediately north of the Guildford - Ash railway line, with Wanborough railway station located in the south eastern corner of the A summary of services available from this station is provided in Table 1 below.

<table>
<thead>
<tr>
<th>Service</th>
<th>Destinations Served</th>
<th>I AM Peak</th>
<th>I PM Peak</th>
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<tr>
<td>Guildford</td>
<td>Guildford</td>
<td>Half Hourly</td>
<td>Half Hourly</td>
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</tbody>
</table>
Table 1 indicates that Wanborough station is served by three rail services routing westbound in the weekday morning peak hour and two services routing In the weekday evening peak hour, three services route eastbound and two services route westbound.

- Summary
  - To summarise the accessibility of the site, Figure 2 provides a public transport travel time plan from the site, highlighting areas that are accessible within 15, 30 and 60 minutes' public transport travel time. This Figure is produced based on public transport options available between 07:00 and 09:00 on a weekday.
  - This Figure indicates that Guildford town centre, in the vicinity of the bus and train stations, is accessible within 30 minutes' travel time from the site. However, the majority of locations surrounding Guildford are located within 60 minutes' travel.

**ROKERS SITE**

- The Rokers site has been excluded from the Proposed Submission Local Plan, but is subject to a live planning application (reference 16/P/01397). This application seeks outline planning permission for:
  - Up to 370 residential dwellings;
  - A new school/education facility (proposed at this stage to be a secondary school);
  - A new community hub with children's nursery, community offices, children's play centre and commercial units;
  - Highway improvements to the A323;
  - Landscaped open space; and
  - A provision of SANGS

With this application being a live planning application, it would be considered that if this application is approved, a school at the Normandy/Flexford site would not be required.

The Rokers site was put forward for inclusion within the Local Plan, but has not been suggested as a draft allocation by the Council. In terms of location and accessibility, it is considered that the Rokers site represents a more sustainable location for a school and residential development than others suggested in the plan.

**Location**

The Rokers site is located on the eastern side of the A323 Aldershot Road, to the east of Fairlands Village. The site is bound to the north-west by Holly Lane, a link between the A323 Aldershot Road and the A322 Worplesdon Road, and to the west by the A323 Aldershot Road.

- Merrist Wood College is located to the north-west of the site, across Holly. The Rokers site therefore provides the potential for an educational hub to be created in the area, with a bus interchange facility provided within the application site to enable bus services to serve both educational sites.
Local Highway Network

- A description of the key vehicle routes in the vicinity of the application site is provided in the following paragraphs. Where relevant, reference is made to a number of automatic traffic counters (ATC) that have been placed on the carriageway in order to record traffic volumes by Each ATC recorded data for a 7-day period between 1st and 7th March 2016.

A323 Aldershot Road

- The A323 Aldershot Road routes on a north-west to south-east axis along the site At the roundabout junction with Holly Lane, the A323 routes west towards Aldershot. The A323 is an important transport corridor as a county distributor road providing access between Guildford and Aldershot and to the A331 in the vicinity of Ash.

Along the site frontage, the A323 Aldershot Road is subject to a 40 miles per hour speed limit with a pedestrian footway provided along the eastern side of the Through the residential areas within the Guildford boundary, Aldershot Road is subject to a 30 mph speed limit and has footways along both sides of the carriageway.

An ATC placed along the A323 between the Holly Lane roundabout junction and Fairlands access junction recorded a two-way average annual daily traffic flow (AADT) of 13,109 This was split 52% westbound/48% eastbound.

Holly Lane

- Holly Lane routes on a north-east to south-west axis to the north-west of the Holly Lane is subject to a 40 miles per hour speed limit and has a shared foot and cycleway along the southern side of the carriageway. This shared foot/cycleway extends along the existing Rakers access road onto Aldershot Road.

An ATC placed along Holly Lane between the existing Rakers access and the Worplesdon Road roundabout junction recorded AADT traffic flows of 10,325 vehicles. This traffic is evenly distributed, 50%/50% between north east and south west bound vehicle movements.

Accessibility to Existing Infrastructure

Proximity to Bus Services

The KITE service routes along the A323 in the vicinity of the site, with services provided between Guildford and Aldershot hot at 15 minute intervals.

- The closest bus stops to the site are located in the vicinity of the Fairlands Avenue/A323 Aldershot Road priority junction, with the bus stop for northbound services located to the north of the junction and the southbound bus stop located to the south of this

- **Figure 3** provides a 400 metre walking isochrone to indicate areas that are located within 400 metres walk of these bus Figure 3 indicates that the majority of the site is accessible within 400 metres walk, based on the existing infrastructure and walking routes, with only the corners of the site located outside of this walk distance.

In comparison, only a small portion of the Normandy/Flexford site is located within walking distance of a bus stop servicing the frequent KITE service, indicating that the Rakers site is more accessible by bus services based on existing infrastructure. This is beneficial as it negates the need for any re-routing of existing bus services or any new bus services to be created, instead increasing the patronage on the profitable KITE service.

In addition, the 17 service provides additional services between Fairlands and Guildford, though less frequent than the

Proximity to Rail Services
• Whilst the nearest railway station to the site is Worplesdon station, the easiest station to access from the site is Guildford railway. The KITE service can be used to access Guildford town centre, with no public transport links available to Worplesdon station.

• Worplesdon station is located on the mainline London Waterloo - Portsmouth railway line and is served every 20 minutes towards London Waterloo and half hourly towards Haslemere and Portsmouth in the weekday morning peak hour. During the evening peak hour, services operate every 20 minutes towards Haslemere and Portsmouth and half hourly to London Waterloo.

Guildford railway station is located on the North Downs Line, in addition to the London Waterloo mainline, providing additional services between Reading and Gatwick Airport. Table 2 below summarises the rail services accessible from Guildford station.

<see attachments for table 2>

• Table 2 indicates that Guildford station is well served by rail services, especially in comparison to Wanborough station served by the Flexford/Normandy.

Summary

• To summarise the accessibility of the Rokers site, Figure 4 provides public transport travel time isochrones detailing areas that are accessible within 15, 30 and 60 minutes' travel time from the site. It should be noted that Guildford town centre is accessible within a 30-minute travel time from the site, with Woking also accessible within this timeframe.

RESIDENTIAL AND SCHOOL COMPARISON

Whilst the above sections detail information on the location and accessibility of the two potential sites, this section will provide more of a direct comparison in respect of access by public transport for the residential and school aspects of each.

Residential Accessibility

• For the residential development, accessibility to the local towns is vital, as these are the areas where the majority of residents will work and head for shopping and leisure trips.

• Figures 2 and 4 provide travel time isochrones from each site and enable the allocated Flexford/Normandy site and the proposed Rokers site to be directly compared.

• Figure 2 indicates that the Flexford/Normandy site enables Ash, Wanborough station and Fairlands to be accessed within 15 minutes' travel time from the site. In comparison, Figure 4 indicates that Guildford bus station is accessible within 15 minutes' travel from the Rokers site, along with Ash railway station, and sections along the A323 and A322 Worplesdon Road.

• In terms of accessibility to local towns, Figure 4 indicates that the Rokers site can access much of Guildford town centre within 30 minutes' travel time, along with Ash and a section of Aldershot. In addition, areas of Mayford are also accessible within a 30 minutes' travel time from the site. Woking is accessible within 60 minutes' travel time alongside Godalming, Clandon, Farnham, Farnborough and areas to the south of Guildford.

In contrast, Figure 2 indicates that the Flexford/Normandy site can access Ash within 15 minutes, and sections of Aldershot and Guildford within 30 minutes' travel time. Within 60 minutes' travel, Woking, Farnborough, Godalming and areas to the south and east of Guildford are accessible.

• To compare the two locations, the areas accessible within a 60-minute travel time are broadly similar, as expected from the relatively short distance between the sites along the A323 and A322 Worplesdon Road. The key difference between the sites is the proximity to Guildford town centre, with Rokers accessible to the majority of the town centre within 30 minutes.
and the bus station within 15 minutes. This indicates that the Rakers site is more sustainably located to residents commuting to work by sustainable modes, with more key locations located within a shorter commuting distance.

School Accessibility

- To assess the accessibility of the school, assumptions need to be made regarding the likely school catchment. This information is not publicly accessible, and therefore assumptions have been based on existing school catchment areas and the stated need for a school to the north and west of Guildford.
- As the Rakers site has already been submitted as a planning application, this comparative assessment will make use of the assumptions undertaken within the Transport Assessment for this development. This utilised a gravity model approach to assess the likely school catchment.
- It is assumed that demand for school places would be mostly driven from northern Guildford and surrounding rural area locations towards Ash and Aldershot and north to Mayford and Given the difference in residential population between Ash and Guildford, the majority of students are expected to come from the north Guildford area.
- By assessing the locations of the nearest secondary schools to the site and their indicative catchment based on school acceptance criteria for distance from the school, it can be seen that Ash is served by Ash Manor. The north west area of Guildford is served only by small school catchments in Bellfields (Christ's College) and Park Barn (King's College). On this basis, a 65% to 10% split will be assessed between Guildford and Ash for the purposes of this gravity model, with the remaining trips from the outlying areas between Ash and Guildford.
- Census data relating to the number of children per ward has been investigated to provide a more detailed gravity model, with Figure 6.6 of the Transport Assessment included at Appendix B providing the gravity model plan used within this. This indicates that the north Guildford area, and in particular the wards of Westborough, Stoughton and Stoke would represent the key catchment area for the school.
- Figures 2 and 4 provide an indication of the likely travel times from each site in the weekday morning peak hour and these provide an indication of the accessibility of the school catchment area to each.

Figure 2 indicates that Westborough ward and a portion of the Stoughton ward are accessible within 30 minutes' travel time from the Flexford/Normandy site, whilst the whole catchment is accessible within a 60 minutes' travel time. Figure 4 indicates that the Rakers site can access portions of the Westborough and Stoughton wards in 15 minutes, with the entirety of these wards and a portion of the Stoke ward accessible within 30 minutes' travel time to the Rakers site. Again, as with the Flexford/Normandy site, the full catchment is located within a 60 minutes' travel time of the site.

- In terms of accessibility towards Ash and the outlying areas, there is little difference between the two sites, with a large part of the outlying areas accessible within 15 minutes' travel Ash railway station is accessible within 15 minutes' travel time with the remainder of Ash accessible within 30 minutes of the Rakers site. In comparison, the Flexford/Normandy site provides access to a larger area of Ash within a 30 minutes' travel time, with areas along the route to Aldershot more accessible.
- In it can be seen that the Rakers site represents a more sustainable location for the school based on its proximity to the residential areas.

Summary

- In summary, it is considered that the Rakers site is clearly better in terms of accessibility and location to the Flexford/Normandy allocated. This is due to key areas including the potential school catchment area and workplace areas within Guildford being more accessible from the site, with larger areas accessible within a 15 and 30-minute travel time from the site.

- SUMMARY AND CONCLUSION
Transport Planning & Infrastructure Ltd has been instructed by Crimson Project Management Ltd to prepare these Transport Representations against the Guildford Borough Council Proposed Submission Local

These representations provide a comparison between the Flexford/Normandy allocated site and the Rokers. The Flexford/Normandy site is included as allocation A46, with the Rokers site excluded from the Proposed Submission Local Plan.

The Rokers site is subject to a live planning application for an educational facility and residential development on land to the east of Fairlands.

In summary, these representations have identified that the Rokers site is ideally located to key infrastructure, with the majority of the site located within a 400 metre walk distance to the frequent KITE bus. In contrast, the Flexford/Normandy site is poorly located to existing public transport infrastructure, despite the location of Wanborough station in the south eastern corner of the site.

In terms of accessibility, the Rokers site is more conveniently located in terms of travel times to local towns and the potential school catchment area, with more key areas accessible within 15 and 30 minutes' travel time compared to the Flexford/Normandy.

On this basis, it is considered that the Rokers site provides a significantly more sustainable location for an educational facility and residential development than the draft allocations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  
POLICY I1 & APPX C_20160715133341.pdf (1.6 MB)

Comment ID: PSLPP16/16001  Respondent: 11183809 / Robinson Escott Planning LLP (Joe Alderman)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We act for Crimson Project Management. This representation relates to the SPATIAL DEVELOPMENT STRATEGY - Policy S2.

Our clients object to Policy S2 and to the accompanying Table 1 on the grounds that the proposed spatial strategy and the proposed allocations in respect of the provision of housing and educational facilities are inconsistent with the overarching strategic objective of delivering sustainable development and the presumption in favour of sustainable development that is set out at Policy S1.

In particular, the draft plan is deficient in not allocating a sustainable urban extension to Fairlands for a mixed use development comprising a new secondary school, housing, community and other local facilities whilst allocating sites for such uses which are demonstrably less sustainable.

Table 1 should be amended to include the sustainable extension to Fairlands as a village extension that will deliver up to 400 new homes within the next five years.

Please see also representations in respect of Appendix C - Infrastructure Schedule and Policy A46 - Land to the south of Normandy and North of Flexford and the comparative sustainability analysis that is contained in these representations.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: POLICY S2_20160715134042.pdf (75 KB)

Comment ID: pslp172/5170  Respondent: 11189889 / Taylor Wimpey South West Thames Ltd (Sir or Madam)
Agent: Woolf Bond Planning (Steve Brown)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Omission Site: Policy A46 - Land to the south of Normandy and north of Flexford

Our client has a controlling interest in a significant part of the land between Flexford and Normandy. In the previous 2016 version of the Plan, the site formed a proposed allocation for residential led mixed use development under Policy A46. It is now proposed to be deleted in the current consultation version of the draft Local Plan. We object to this proposed omission and wish to see the Policy A46 allocation retained.

Consideration of the Council’s Evidence Base and Proposed Green Belt Releases

The proposed deletion of the site is explained by the Council at paragraphs 4.26 and 4.27 of the report to Full Council dated May 2017 which stated:

“Site allocation A46: Land to the south of Normandy and north of Flexford

This site was allocated for 1,100 homes, six Travelling Showpeople plots and a mix of other uses. It is a high sensitivity Green Belt site which was only proposed to be allocated previously on the basis of its ability to provide the secondary school required to meet the development needs arising in the west of the borough. Since the previous consultation, the promoters of Blackwell Farm have now confirmed that they are willing to provide a secondary school on their site. Blackwell Farm is a preferable location in relation to both school place planning and sustainability perspectives, and was only discounted previously on the basis that the site was not available for education provision. Given the site consists of the whole land parcel assessed to be high sensitivity Green Belt, the allocation of this land would result in significant harm to the Green Belt. However great weight was given to allocating a site that could provide an eight form entry secondary school in the west of the borough. Whilst there would continue to be some sustainability benefits associated with the allocation of the site in relation to additional services, given the other harm we do not consider that this is justified without the benefits associated with the provision of the secondary school.”

We object to the Council’s suggestion that our client’s site is a ‘high sensitivity Green Belt site’ and for the reasons set out below note that it actually compares favourably to other proposed Green Belt releases in the Plan. However in any event, we refer to paragraph 24.66 in Volume 5 of the Council’s Green Belt & Countryside Study (April 2014) that states:

‘A PMDA at land parcel H12-A between Flexford and Normandy would be appropriate as a major village expansion due to the established public transport links alongside potential improvements to sustainability credentials, being considered to outweigh the potential harm to the openness and purposes of the Green Belt. A major expansion at H12-A between Flexford and Normandy would generate an additional population of
approximately 2,599 and a total population of 4,383, this being very likely to enable a wide range of new facilities with associated sustainability benefits. The location of H12-A between Normandy and Flexford is considered to be particularly sustainable in terms of public transport connections with Wanborough Station located directly to the south within Flexford in addition to the bus services. The PMDA would result in greater settlement coalescence of Flexford and Normandy (Purpose 2). Whilst recognising that any major village expansion will detract from the openness of the surroundings, in this instance, the PMDAs impact will be limited on the wider Green Belt due to extensive woodlands, treebelt and hedgerows, particularly at Waldens Copse and Pusseys Copse within the village expansion site’ (Our emphasis)

It has never been our understanding that our client’s site was included as a proposed Green Belt release due solely to its ability to deliver a secondary school. The reason for its previously proposed allocation is effectively summarised in the above statement.

Land for a secondary school was only proposed as part of our representations upon the proposed safeguarded status of the site in the draft Local Plan published for consultation in July 2014. Accordingly, the offer of land for the school was made by Taylor Wimpey after the Council’s Green Belt assessment (see above) confirming the suitability of developing the site in Green Belt terms, including having regard to the sustainability merits of doing so in locational terms (given the proximity of the site to bus and rail services).

In short the land benefits from sustainability credentials that justify its release, in particular, given its enabling benefit of providing land for a new secondary school to serve needs arising from the western part of the Borough and that the land’s impact upon the Green Belt will be limited due to its existing vegetation. There is therefore a fundamental inconsistency between the Plan’s evidence base and the decision taken by the Council in May 2017. Accordingly, the Local Plan is not justified when considered against its own evidence base in this respect.

With the above findings in mind, our clients instructed CSA Environmental to undertake a detailed review of the Council’s Green Belt evidence base documents. This work includes a comparative assessment of certain of the proposed Green Belt allocations and confirms in relation to the sites as follows:

- The assessment has highlighted some fundamental flaws in the selection of the sites to be removed from the Green Belt and allocated for housing.
- The sites proposed to be allocated should be re-evaluated and the A46 site reinstated as a housing allocation.
- Land at Garlick’s Arch (Policy A43) fails the Council’s Stage 1 Green Belt test and should be removed on sustainability grounds.
- Land at Blackwell Farm (Policy A26) is clearly detached from the existing urban edge and represents significant encroachment into the countryside and the proposed access to the site emphasises its poor relationship to the urban area – with the proposed access road extending approximately 0.75ha through the Surrey Hills AONB and Area of Great Landscape Value. This site should be deleted as a proposed allocation.
- The Former Wisley Airfield (Policy A35) is poorly related to any urban areas and its removal from the Green Belt would represent significant encroachment into the countryside. The linear form of the allocation does not lend itself to a sustainable form of development. The proposed allocation should be removed from the Green Belt.

Overall, the CSA report identifies fundamental failings within the Council’s approach in respect of the proposed release of Wisley Airfield and parts of Gosden Hill and Blackwell Farm having regard to their consistency with national policy not least the Green Belt purposes established at paragraph 80 of the NPPF.

When assessed against the paragraph 80 tests, it is evident that paragraph 24.66 of the Council’s Green Belt & Countryside Study was correct and the site performs well when assessed the five purposes.

Importantly the Council’s proposed allocations perform in certain cases poorly when considered against the NPPF paragraph 80 purposes. Accordingly we request that our client’s site is reallocated either in addition to, or instead of other proposed Green Belt releases. As drafted, the Plan is not justified or consistent with national policy, given that the reasonable alternative of allocating land at Normandy/Flexford, that provides a more sustainable and NPPF Green Belt compliant strategy.

On its own merits the actual visual and Green Belt implications of releasing the Policy A46 site for development are not adverse. Moreover, and on a comparative basis, the impacts from allocating the site are comparable to certain of the other proposed releases and better than others (including Wisley Airfield).
**Land at Normandy/Flexford (Policy A46) - Site Description**

We set below out the site’s respective benefits as a potential residential led mixed use allocation. The site lies mid-way between the towns of Guildford and Aldershot in Surrey. It is bound by the settlement of Normandy to the north and Flexford to the south. The Great Western railway line between Guildford and Reading runs adjacent to the site’s southern boundary, with Wanborough Station located adjacent to the south east corner of the site. To the north of the site lies Guildford Road (A323), with Westwood Lane to the west and Glaziers Lane to the east. The site extends to approximately 69ha and comprises a series of medium to large pastoral and arable fields, several woodland copses and a number of small farm buildings. The logic of the site’s location is appropriate particularly due to its location adjacent to a train station that offers direct services between Guildford and Reading.

**Sustainability Considerations**

The site is in a sustainable location, adjacent to Wanborough railway station which provides frequent services to Guildford and Ascot via Aldershot as well as some direct services to Reading and Gatwick. Train services connect to the following main employment centres:

- Guildford
- Woking
- London
- Reading

Journey times to Guildford and Woking are particularly appealing, taking just 7 minutes to Guildford and only 23 minutes to Woking during peak hours (total journey time including 1 change at Guildford).

Two bus routes serve the site and there is potential to divert these through the site to make these services closer for future residents, a matter which can be addressed/funded/secured by means of a legal agreement as part of the subsequent planning application. In short, re-routing buses into the site, providing access to the schools and the local centre, will serve to enhance the sustainability merits of the wider area, including for the existing nearby villages.

The site also benefits from good cycle links to Ash and Guildford, which routes could be further enhanced in the form of a planning obligation to be secured at the planning application stage.

As to highway matters, detailed technical highway work has been undertaken by Odyssey Consult who have identified that the surrounding road network has adequate capacity to accommodate the level of proposed development. Access to serve development of the site is proposed from Westwood Lane and Glaziers Lane.

**Masterplan Considerations**

Informed by meetings held with the Council since 2014, our client has undertaken detailed masterplanning and technical work across the entire site so to demonstrate the deliverability and appropriateness of the land for strategic development. Our representations are supported by a number of concept Masterplans as follows:

- Masterplan CSA/2516/110/D – the basis of the policy A46 allocation
- Masterplan CSA/2516/110/F – 1,300 dwellings (omitting the provision of a secondary school)
- Masterplan CSA/2516/120/A – 425 dwellings at Flexford, including a proposed local centre
- Masterplan CSA/2516/121/B – 400 dwellings at Wanborough Stn, including a proposed local centre[1]

Background technical work has been undertaken in order to inform the content of the masterplan, including highway, drainage, landscape and ecology work.

Concept Masterplan (Plan No. CSA/2516/110/D) proposes circa 1,100 dwellings on approximately 28ha of residential development, equivalent to around 37dph which enables the provision of a range of dwellings types in accordance with the findings of the SHMA, including the housing mix at paragraph 4.2.3 of the Local Plan. This Masterplan formed the basis of the policy A46 allocation and shows how the site could deliver strategic benefits for the wider area in terms of supporting infrastructure, consisting of:

- Primary school;
- Secondary school;
- 60 bedroom care home;
- Local centre;
- Playing fields;

[1] Masterplan CSA/2516/122/B shows a comprehensive proposal to include the schemes from Plans 120/A and 121/B

- New children’s play areas; &
- Site for travelling show people.

It is considered that the mix of uses proposed forms a key element in creating a successful and sustainable neighbourhood, which will deliver a range of benefits, as follows:

- A number of community focal points spread throughout the development, with a natural landscape buffer existing between the two villages so to give the development a two village character;
- Convenient access to facilities, providing the critical mass to make the wider area more sustainable (including through increased frequency of public transport services and the provision of local services and facilities);
- Architectural interest created by non-residential buildings, whose status and function will create new local landmarks;
- Opportunity for innovative sustainable building technologies to be used in non-residential buildings;
- Greater opportunity for social interaction due to greater pedestrian activity;
- Substantial areas to be provided for formal and informal recreation; and
- Education opportunities

The Masterplan accounts for the site’s existing environmental features, which include woodland and tree belts (including designated ancient woodland) and a public footpath running between Glaziers Lane and Westwood Lane.

The new parkland is envisaged to incorporate multiple functions and uses, including new sports pitches, children’s play areas, new routes for walking and cycling and areas for informal recreation. The existing woodland, trees and hedgerows will form an integral part of the parkland, providing an instant sense of maturity to the new public open space. The areas of ancient woodland will have restricted access to ensure their ecological value is protected and benefit from 15 metre buffers consistent with national guidance. In total the Concept Masterplan accommodates approximately 29ha of green infrastructure.

The local centre, primary school and care home are proposed to be located close to one another in order to encourage residents to make multi-purpose trips to the local centre. A bus route is illustrated to run through the site, enabling all future residents to live within a short walking distance from a bus service. Further the secondary school is purposely sited on the site’s southern side so to facilitate sustainable transport movements via Wanborough station.

Clearly, the above service offer will be further assisted by the additional services that would be constructed as an outcome of the proposed scheme. It is further noted that the provider, Great Western Railway, are presently carrying out upgrades to the train line running through Wanborough, which will result in improved services. Clearly the additional patronage generated by the proposed development will only further support the viability of this service.

As part of this scheme, we can bring the secondary school site forward early on in the development phase to meet current education needs within this part of Guildford Borough. This is of particular importance should there be any delay in delivering a secondary school at Blackwell Farm.

In the alternative, should the Local Plan Inspector be of a mind to support the provision of a secondary school at Blackwater Farm (despite our objections to the allocation of the site), we have prepared a second overarching Masterplan (CSA/2516/110/F) showing how the site could be development for up to 1,300 dwellings without a secondary school.

Additional Masterplans show how smaller land parcels could be developed for circa 400 dwellings (Plans CSA/2516/121/A and 122/A) either in isolation or in combination. This further supports the merits of the land as a flexible allocation to meet the identified need for housing in the early part of the plan period.

**Flood and Drainage Considerations**

Flood and drainage considerations have also been assessed by Odyssey Consult. The site is predominately located outside the floodplain in Flood Zone 1 and is well positioned to deliver residential development in accordance with the NPPF thus
satisfying the sequential approach in the SFRA. A proportion of the site in the vicinity of Walden’s Copse is located in Flood Zones 2 and 3. However, the proposed development footprint will be positioned outside the floodplain in accordance with the Sequential Approach and in order to reduce impact to the floodplain and flood risk downstream.

A drainage strategy will be developed in accordance with EA requirements including proposals to enhance the existing watercourses within green corridors, dry swales and attenuation basins to ultimately discharge surface water runoff at existing greenfield rates downstream of the site. For these reasons, matters relating to flood risk and drainage should not impede the development of the site.

**Ecological Considerations**

Our client is aware that the proposed residential scheme requires the delivery of a Suitable Alternative Natural Greenspace to provide mitigation for potential recreational impacts to the Thames Basin Heaths Special Protection Area (‘TBH SPA’). Accordingly our clients have agreed an off-site SANG provision 0.5Km to the west of the site at Wyke (see SANG location plan attached). This is linked to the site by way of an existing public footpath and enables the efficient use of the site for residential and associated development, whilst providing new walking areas to the benefit of both new and existing residents.

Initial walkover surveys have been undertaken on both the Wyke SANG and the proposed allocation under policy A46 and show that nature conservation interests within the site are concentrated to the areas of ancient woodland, broadleaved woodland, mature trees, hedgerow and the watercourse that runs through it.

**Deliverability**

For the reasons discussed in our response to Policy S2, there is an demonstrable need for deliverable sites, such as that controlled by our client in order for the Council to be able to demonstrate a continuous 5 year housing land supply throughout the plan period. Its development credentials have been acknowledged in its previously proposed allocation and the site suffers from no technical constraints to delivery. The site is controlled by a national house builder, who has secured appropriate off-site SANG mitigation land at Wyke (SANG location plan attached) and is undertaking detailed survey work to enable a timely outline submission upon adoption of the Plan. Consequently the site offers the opportunity for material delivery within the 5 year period. We consider the site could deliver 100 dwellings by 2021/22, 140 dwellings in 2022/23 and a further 140 dwellings in 2023/24. Such an approach would assist in meeting the defined and pressing needs discussed above. The re-allocation of the site is therefore necessary so to achieve an effective plan that is delivers housing at the necessary time (i.e. early on it in the plan period).

**Alternative Allocation Options**

Our clear position is that the site should be reinstated as an allocation under Policy A46 and the Council’s proposal to de-allocate the site is unsound.

However, and notwithstanding, the site at Normandy/Flexford was identified within several volumes of the Council’s Green Belt & Countryside Study, both as a smaller development parcel in the south (adjacent to Wanborough station) of approximately 280 dwellings and a larger development of approximately 1,100 dwellings.

The current iteration of the Local Plan has removed the site as an allocation without reconsideration of a potential smaller allocation. Accordingly, we have prepared 3 no. new masterplans that illustrate how smaller developments could come forward on the site and still provide a material contribution towards defined housing needs. These are described below:

- Concept Masterplan – Wanborough Station (No. CSA/2516/121B) illustrates a proposed scheme on the southern part of our client’s site. This would provide for approximately 400 no. dwellings, a 2 form entry primary school, local centre and large of areas of publicly accessible green space. A direct pedestrian route to Wanborough station is also provided.
- Concept Masterplan – Great Westwood (No. CSA/2516/120A) provides for approximately 425 no. dwellings on the northern part of our client’s site. A 60 bed care home, local centre, community facility, sports pitches and public open space are also provided.
- Concept Masterplan – Combined (No. CSA/2516/122B) illustrates how both of these schemes could be developed, whilst retaining a significant gap between

Normandy and Flexford. It is evident from this plan that a self-sustaining community, with a multitude of key services and facilities and good accessibility to public transport can be provided on the land. Such a scheme would enable substantial housing delivery and as set out in the CSA Green Belt Review in a manner consistent with NPPF paragraph 80.
In light of the above and the finding that the Council have failed to review these alternative reduced options, we request that this exercise is carried out by the Council prior to submitting the plan for examination.

Securing a Permanent Green Belt Boundary Beyond the Plan Period

In addition, NPPF paragraph 83 requires that when undertaking a Green Belt Review Council’s should consider the intended permanence of the revised Green Belt boundaries such that they should be capable of enduring beyond the plan period. Accordingly we refer to paragraph 4.115 of the original draft Local Plan (July 2014) that stated:

‘National planning policy states that when altering boundaries we should have regard to their intended permanence in the long term so that they are capable of enduring beyond the plan period. This includes, where necessary, identifying safeguarded land in order to meet longer-term development needs. We have identified safeguarded land at Fairlands, Send Marsh, Normandy and Flexford, as set out in Site Allocation 118-120 and 123. This land will also ensure that we have the flexibility to meet our current development needs should any of our strategic sites not come forward as envisaged over the plan period’.

Contrary to the above statement, the plan no longer includes proposals to safeguarded any land to meet longer term development needs. Such an approach is inconsistent with NPPF paragraph 83. The safeguarding of additional land would introduce greater flexibility into the Plan so to ensure that if one of the proposed housing allocations does not deliver, safeguarded land could fill the gap without the need for a new Green Belt review. It follows that such an approach would enable a more effective plan.

Summary: Proposed Change

We object to the proposed deletion of our client’s land between Flexford and Normandy (Policy A46) as a housing led mixed use allocation. For the reasons set out in these representations we request that it is reallocated in the form previously proposed.

Notwithstanding the above position, alternative options are also available and we are seeking an allocation for smaller schemes as set out below:

1. Allocate the site but with reduced site boundaries that cover the southern and northern sites, resulting in an overall allocation for approximately 825 no. dwellings.

2. Allocate the Wanborough Station site for a residential led allocation comprising approximately 400 no. dwellings.

3. Allocate the Great Westwood site for a residential led allocation comprising approximately 425 no. dwellings.

4. Identify our client’s site as safeguarded land removed from the Green Belt to meet longer term needs beyond the plan period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- Letter_to_LPA__LP_Reps__TW_Normandy__FINAL_Signed__24_July_2017.pdf (386 KB)
- Housing_Needs_in_Guildford.pdf (759 KB)
- 2516_09_A_Green_Belt_Review.pdf (2.5 MB)
- SANG_Location_Plan.pdf (13.1 MB)
- 2516_121_B_Concept_Masterplan_Wanborough_Station_Site.pdf (861 KB)
- 2516_110_D_Concept_Masterplan_Email.pdf (1.5 MB)
- 2516_120_A_Concept_Masterplan_Great_Westwood_Site.pdf (814 KB)
- 2516_122_B_Concept_Masterplan_Combined_Sites.pdf (1.6 MB)
- 2516_110_F_LandscapeLed_Masterplan_email.pdf (1.6 MB)
Overall Housing Requirement

Since the previous consultation, the Council have reduced the overall housing target from 693 dwellings per annum (dpa) to 654dpa.

In support of our representations, Turley have produced a critique of the Council’s assessment of objectively assessed need and the associated evidence base.

The Turley report concludes that the Council’s updated OAN is not predicated upon a sound evidence base and fails to adequately assess demographic pressures or apply reasonable expectations in respect of job growth.

In addition, evidence is provided to demonstrate that the Borough suffers from acute housing affordability issues, such that a minimum uplift of 10% should be applied to the demographic projection of housing need to allow for market signals.

Consequently, the Turley report recommends that the Borough’s OAN should be revised to a minimum of 717dpa during the 19yr plan period (2015 to 2034), totaling 13,623 dwellings. For the avoidance of doubt, this proposed level of growth is only to meet needs arising in Guildford.

There is a requirement to fulfil the duty to cooperate having regard to need to address Woking’s unmet housing need. Paragraph 4.6 of Guildford Borough Council’s Housing Delivery Topic paper (June 2017) identifies an unmet need for Woking totaling 3,150 dwellings in the 14yr period 2013/14 to 2026/27. This would result in an additional requirement in excess of the 7171dpa identified in Turley’s assessment (see below).

For these reasons, the proposed housing requirement is not justified upon appropriate evidence and is not effective or consistent with national policy by failing to meet the Borough’s overall market and affordable housing needs.

Unmet Need Elsewhere in the Housing Market Area

In addition to undertaking an assessment of the Borough’s true OAN, the Turley report considers the level of unmet need arising elsewhere in the Housing Market Area (HMA) that comprises Guildford Borough, Waverley Borough and Woking Borough.

As referenced above, Woking’s unmet housing need (the difference between Woking’s adopted Core strategy requirement and the OAN) is 3,150 dwellings for the period 2013/14 to 2026/27. Currently there is no plan-led strategy to meet this unmet need in so far as Woking is currently preparing a Site Allocations DPD to meet the housing requirement in the Core Strategy, not that set out in the SHMA..

The proposed submission version of the Guildford Borough Local Plan makes no allowance for Woking’s unmet housing needs, nor does the submitted Waverley Borough Local Plan (presently at examination). Both plans purport to meet their own OAN in full, without any provision for Woking Borough. Moreover, there is no intention from Woking Borough to undertake a plan review that accounts for this need.

It follows that there is substantial housing under provision elsewhere in the HMA and as a Green Belt authority with no advancing plan review, this trend in Woking Borough shows no sign of resolution in the short or medium term.

Given the clear requirement set out in the NPPF for any shortfall across a HMA to be considered on a ‘collective’ basis this issue cannot be underplayed. It should be remembered that NPPF paragraph 47 requires Council’s to ensure that their Local
Plan meets full OAN for market and affordable housing in the entire housing market area, not only within their administrative area.

For the above reasons, there is a need for Guildford Borough Council to increase the housing requirement so to better respond to defined pressing needs for market and affordable housing both within Guildford Borough and the HMA.

As drafted the Proposed Submission Local Plan fails the positive preparation soundness test on this basis.

Within the West Surrey HMA, Guildford evidently exhibits the strongest housing market linkages with Woking when compared with Waverley e.g. the strongest commuting flow from Woking is to Guildford (West Surrey SHMA (Sept 2015) (Para 2.43)).

Given the close function relationship between Woking and Guildford, it is logical to expect Guildford Borough to accommodate a greater percentage of Woking’s unmet need than might be expected to be met in Waverley which is located to the south of Guildford.

On this basis, we are of the view that Guildford Borough should accommodate at least 50% of Woking’s unmet housing needs. This means accommodating an additional 1,575 dwellings in Guildford Borough (Woking’s unmet need of 3,150 dwellings x 50%).

We therefore consider that the overall proposed housing requirement should be revised to make provision for at least **15,198 new dwellings** (13,623 + 1,575) (800dpa (rounded)) over the plan period 2015 to 2034.

Proposed Phasing of the Housing Requirement

Paragraphs 6.27 to 6.31 of the Turley report consider the point at which the need for housing occurs within Guildford Borough during the course of the plan period.

Figure 6.1 of the Turley report demonstrates that the sharpest projected household growth in the plan period occurs in the first five years of the plan period (2015-20). This growth then declines throughout the plan period such that it is at its lowest level at the end of the plan period. Conversely, the Council is proposing a phased annual housing target that increases from 450dpa to 850dpa over the lifetime of the plan.

We have reviewed the position and even on an annualised basis, applying the Council’s unsound 654dpa requirement, page 8 of the Council’s Land Availability Assessment (“LAA”) (June 2017) show that the deficit in supply accumulated from the 2015 base-date of the plan period will not be addressed until 2025. This is wholly illogical and will result in a failure to meet housing needs for the first 10 years of the plan period and represents the antithesis of boosting significantly the supply of housing land which position is articulated at paragraph 47 of the Framework.

The above approach is inconsistent with the NPPF and Housing White Paper that require LPA’s to significantly boost the supply of housing now. This is especially relevant in Guildford Borough, that forms a Borough that has been the subject of a long standing housing land supply deficit and has persistently under delivered against identified needs. Consequently we object to the notional annualised housing targets included at in the table included at the bottom of Policy S2, on the basis this approach is inconsistent with national policy and is not justified by failing to reflect the clear evidence that the greatest housing need occurs early on in the plan period.

Five Year Housing Land Supply

Before commenting specifically upon the Council’s proposed housing distribution, we note there is a need for the plan to demonstrate a five-year housing land supply on the date of adoption. Any failure to secure this comprises an issue of soundness in respect of compliance with NPPF paragraph 47 and the objective of significantly boosting the supply of housing land and the requirement to demonstrate a five year supply.

The importance of demonstrating a 5 year housing land supply upon adoption, in order to achieve a sound plan, was noted by an EiP Inspector in examining the Canterbury District Local Plan:
‘The Framework indicates that relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a 5-year supply of deliverable sites. As such, I consider that the Plan would be ineffective and not accord with national policy. It would therefore be unsound unless this can be remedied’.

We have commented above that the proposed housing requirement needs to be increased to 15,198 dwellings (800dpa) and that the proposed phased housing target approach is unsound. However, and even if one assesses the Council’s proposed phased housing requirement (from Policy S2) against the Council’s housing trajectory at page 8 of the Council’s Land Availability Assessment (Addendum) (June 2017), it is evident that the Council will not meet the cumulative phased housing requirement until target until 2024/2025 (there is an error in the entries in the penultimate row of the table on pg8 of the Council’s Land Availability Assessment (Addendum) (June 2017))

On the basis of the Council’s phased housing requirement (which approach relies upon a lower target in the first seven years from the anticipated date of adoption (2019 onwards) completions will be significantly below the artificially constrained phased housing requirement until 2024/25.

At the rate of completions assumed by the Council, the cumulative deficit would extend further into the plan period if the unsound phasing of the housing requirement were corrected and the 654dpa annualised target was to be used for monitoring purposes. In addition, any uplift in the OAN to take account of the representations made, including the assessment undertaken by Turley, would compound the position yet further.

We illustrate the position against the Policy S2 phasing approach in Table 1 below:

[Table 1]

The position set against an annualised 654dpa on the basis of the Council’s derived OAN of 12,436 dwellings during the 19 year plan period is set out in Table 2 below:

[Table 2]

Table 2 shows a cumulative shortfall of 856 dwellings against the 654dpa annualised target within the first 10 years of the plan. Of particularly concern is that the cumulative target is not met until 2029/30. This further emphasises the flawed approach to housing delivery in so far as current needs won’t be met, on the Council’s trajectory for 12 years. The position is even more stark when one applies the Turley OAN of 717dpa or the 800dpa taking into account Woking’s unmet need.

In light of the above findings it is clear that a material housing land supply deficit occurs upon adoption of the Plan and will be sustained for a long time into the plan period. On the basis of the foregoing, the Council is not able to demonstrate a five year supply of deliverable housing land on adoption of the Plan.

Housing Delivery
It is therefore essential that the Plan identifies sites that can deliver within the early part of the plan period in order to secure the soundness requirement to demonstrate a 5-year housing land supply upon adoption. This becomes yet more essential when one considers the past under delivery in the Borough, the resulting impact from this sustained under delivery, is reflected in the Turley evidence (Figure 6.1) that confirms the need for housing is most pressing in the early years of the plan period.

A further consideration of particular standing is that the above positions reflect the Council’s delivery assumptions, which relies upon unreasonable assumptions relating to the delivery of the strategic sites, including Slyfield (A24), Gosden Hill (A25), Blackwell Farm (A26); and Former Wisley Airfield (A35).

Given the inherent difficulties in securing the requisite infrastructure funding and provision for these sites, in particular improvements to the A3 (including new junctions) as well as, in the case of Slyfield, the need to find a site and deliver a new waste treatment works, we are of the view that the trajectories for these sites are too optimistic and unrealistic.

Setting aside our objections to the Wisley Airfield site as a matter of principle, even delaying these sites by only two monitoring years would see the loss of 1,360 dwellings from the Council’s purported supply. This demonstrates the lack of flexibility in the plan to deal with changing circumstances.
We are aware that as a Green Belt constrained authority and one that has failed to have an up to date development plan for many years, the Borough faces a significant challenge in reversing this historic under delivery early on in the plan period. However, it is essential that this under delivery (i.e. the green line illustrated in the LAA above) is rectified as early on in the plan period as possible.

We note that the Borough’s current Local Plan became time expired in 2006. It follows that the Council have failed to plan for housing growth in a proactive plan led manner for over a decade. This is the reason for such substantial under delivery over the past decade and the resulting need for housing in the early part of the plan period, which position we say is acute.

The Borough’s failure to produce an up to date Plan over this period must not be used as justification to delay housing delivery until the latter part of the plan period. Consequently there is an essential need to review whether a revised spatial strategy would enable a greater level of housing delivery in the first 5-10 years of the proposed plan period.

Part of the necessary solution is to identify sites that can provide material boosts to the overall deliverable supply within the immediate five year period. Presently the plan is overly reliant upon sites that have significant lag times associated with them. Our client’s proposal (see representations below) would enable two or more sales outlets to be established on the Normandy/Flexford (Policy A46) site with completions at approximately 60+dpa per outlet.

If one were to apply a base date of say 2019 (from anticipated adoption of the Plan), a minimum of 300 dwellings could be delivered at the Normandy/Flexford site within the 5 year period to 2024. Such deliverability is achievable in part due to the site’s greenfield nature and the fact that it is controlled by an established national housebuilder.

**Proposed Changes:** Increase the housing target to a minimum 15,198 (800dpa) dwellings over the plan period 2015 to 2034.

**Removal of the ‘annual housing target’ table at the bottom of Policy S2.**

[Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
- Housing Needs in Guildford.pdf (811 KB)
- SANG Location Plan.pdf (8.0 MB)
- 2516_121_B_Concept Masterplan_Wanborough Station Site.pdf (861 KB)
- 2516_110_F_Landscape-Led Masterplan_email.pdf (1.6 MB)
- 2516_110_D_Concept Masterplan_Email.pdf (1.5 MB)
- 2516_120_A_Concept Masterplan_Great Westwood Site.pdf (814 KB)
- 2516_122_B_Concept Masterplan_Combined Sites.pdf (1.6 MB)
- Letter_to_LPA__LP_Reps__TW_Normandy__FINAL_Signed_24_July_2017.pdf (386 KB)
The NPPF sets out the principal components to be included in local plans. Paragraph 182 requires that in order to be “sound” a DPD should be positively prepared, justified, effective and consistent with national policy.

In order to be justified the DPD must be founded upon a robust and credible evidence base and represent the most appropriate strategy when considered against the reasonable alternatives.

Effective means the document must be deliverable, flexible and be able to be monitored.

The positive preparation test also requires plans to objectively assess development and infrastructure requirements from neighbouring authorities.

For the reasons set out below there are a number of shortcomings with the plan, as currently drafted, that result in the need for amendment. These amendments relate to the need to increase the level of housing provision; a need to meet existing housing needs in the earlier part of the plan period and acknowledgement that the existing supply of housing commitments are insufficient in both quantum and nature to meet these more immediate needs. These concerns require the need to reconsider the proposed spatial strategy and identify additional allocations within the plan.

As mentioned above, our clients have a controlling interest in land between Normandy and Flexford. The site is available, suitable and deliverable to meet important housing needs in the immediate period of the Local Plan. We remain committed to further engagement with the Council to explore the option of a deliverable allocation on this site, such that it can be incorporated into the final version of the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4469  Respondent: 11190945 / Arjen Naafs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Re: Strong Objection to Blackwell Farm development A26

Dear Sir, Madam,

Beechcroft Drive is located close to the proposed development on Blackwell Farm and we have an intimate knowledge of the proposed area and its surroundings. As a Residents Association, we have come to the conclusion that we strongly object the development, based in summary on the following points:

- The traffic associated with 1800 houses simply cannot be supported by the local road network and will lead to:
  1. Larger congestion around the Royal Surrey County Hospital - ultimately threatening accessibility for emergency
  2. Traffic trying to avoid cathedral roundabout will be diverting to Onslow Village and Park Barn – thus affecting safety, pollution levels, and liveability for residents in a much larger
  3. Further gridlocking of A31, A3 and Farnham Road on daily basis, leading to reduced accessibility of Guildford from the South and West as a whole, with all economic and social Adapting local roads, the
A31, A3 and cathedral roundabout to cope with this traffic will be extremely expensive and arguably make the A26 (Blackwell Farm) development financially unviable. This is supported by the Technical Note by the Traffic Consultant RGP as presented by Compton PC.

- Furthermore, infrastructure should be improved prior to any construction; this includes enhancing hospital capacity – which is not planned at the moment - and secondary school. Both are known to be under pressure at the moment.
- The Blackwell Farm area is very visible from the Hog’s Back and as such will destroy the views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty, greenbelt and AONB has detrimental impact on setting of the town, availability for future generations and removal of valuable farming land - which is very scarce already in the South-East, seems inappropriate.
- The ancient woodlands (last remainder of Medieval royal deer park of Henry

1. II) play an essential part in the local eco-system of the larger Hog’s Back area. The railway line and building to the North, and the proposed large scale developments in the West, would mean that migration to and from this essential habitat is limited to the The proposed road from the Blackwell Farm to the A31 effectively completes the isolation and cuts natural migration patterns to the woodlands completely. From ecological point, this removes (one of) the largest forests west of Guildford from the greenbelt and places it within the urban area (Figure 1):

- We further support the Guildford Residents Association in its observation (Report Neil McDonald) that the housing needs as per the local plan are overestimated, and as such development plans are over designed (even excluding consequences of Brexit)
- The Blackwell Farm site includes 6 Travellers pitches, which we believe should be sited in more sustainable locations (not within greenbelt). In addition, counting them towards the developer’s quota of affordable housing is a ludicrous method to try to fulfil the obligation of providing affordable We therefore object to them, as well as the rest of the large-scale development being included within site A26.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  L JPG (113 KB)

Comment ID: pslp172/4227  Respondent: 11199841 / Woodstreet Village Association (Neville Byran)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

(Allocation 9)

Adding a secondary school will exaggerate the already unacceptable traffic situation. We refer to the RGB technical note produced for Compton and Worpleydon parish councils dated June 2017.

(Infrastructure 1) Access to this site is along existing congested roads. The 20% uplift on the A3 in 2011 was never addressed, and this will have a similar impact on the A31, and feed roads. This will exaggerate the already unacceptable traffic situation. We refer o the RGB technical note produced for Compton and Worpleydon parish councils dated June 2017.

The two areas proposed are through points
• Southern access is through an AONB
• Eastern Access is through/next to Ancient Woodland

(Infrastructure 3 ) Control of through traffic (turning the new estate in to a run like Park Barn and Wood Street already are) will be unenforceable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4228  Respondent: 11199841 / Woodstreet Village Association (Neville Byran)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We not however that the A323 at both school pinch points remains heavily congested at school opening and closing. The provision of an extra bridge on A323 will compound this point, and there is no mitigation listed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2531  Respondent: 11199841 / Woodstreet Village Association (Neville Byran)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas

Ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]

Adds to air pollution in neighbouring areas, which already exceed safe EU limits.

If expansion is required, the first options would surely to be to increase density. There is a lot of wasted space over Surrey Research Park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The amended definition does not provide for enforcement or corrections for the previous under provision of student accommodation by the University of Surrey.

Housing targets should include the students, however due to restricted land supply, future expansion (and previous under build to 2003 commitment) should 85% be accommodated on the University campus. We are recommending at a minimum, 4500 student accommodation places to meet the 2003 plan proposals (not provided), plus 1 student place for each additional FTE student attending the University of Surrey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

We do not believe the maths support developer funding the infrastructure and the affordable housing requirements via any method, including CIL. Indeed it is doubtful they would they would add up to a significant part of either infrastructure OR affordable housing costs required. On this point alone the proposed plan fails.

We note that since the previous plan, Guildford has been identified as the 4th most congested town in England.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The A3 tunnel is not funded and now with the logical North/East access now under a housing estate, it seems this proposal is no longer valid. There are no other options / alternatives outlines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

We see the amendments, but this appears to weaken the AONB protection. We maintain the requirement of this policy is to fully consider the AONB build policy against eh 5 key tests.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Wording amendments are not specific. We need to manage implications of changes and building on flooding. Specifically we mention site A26 (Blackwell Farm), as the runoff water courses have been identified as affecting Wood Street Village, Fairlands, etc... as well as environmentally protected areas (covered by GBC and SCC policy), such as the Thames Heath Basin SPA, Whitmoor Common, and wetlands downstream in the river Wey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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We support policy 4.1.4. We recognise the policy now complies with the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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A modified target of 12426 houses still does not reflect local need or conditions.

Conversely changing the target based on a SHMA document which remains unexplained adds to the accusation that the number is made up, rather than calculated based on a clear set of assumptions.

Guildford is a town of 70000 residents, and we have a University of 14000 students. Under any definition that is a monopoly. The affect this has had on the town, and housing is dramatic.

Guildford residents association (GRA) have employed a professional analyst (Neil MacDonald), and I would defer to his report and conclusions, on numbers and lack of transparency.

[https://www.guildfordresidents.co.uk/app/download/30614509/Review+of+GL+Hearn%27s+Guildford+Addendum+to+the+West+Surrey+SHMA.pdf](https://www.guildfordresidents.co.uk/app/download/30614509/Review+of+GL+Hearn%27s+Guildford+Addendum+to+the+West+Surrey+SHMA.pdf)

We should NOT be taking unfulfilled housing needs form Woking and Waverly. We have no space for our own.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3886  Respondent: 11268769 / Bridge End Farm, Ockham (Julian and Nicola Harris)
Agent: CBRE (Mark Novelle)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

PROPOSED SUBMISSION LOCAL PLAN - CONSULTATION REPRESENTATIONS

I am pleased to herewith submit representations to the ‘Guildford Proposed Submission Local Plan: Strategy and Sites’ consultation, ahead of the consultation deadline of 11:59 Monday 18 July 2016. CBRE Ltd acts on behalf of Julian Harris and Nicola Harris, the legal owners of c.14.5 hectares (36 acres – plan attached) of land and buildings known as Land at Bridge End Farm, Ockham, which is promoted through this consultation and these representations.

This letter sets out the background to ownership of the land promoted through this consultation and the representations themselves.

Land at Bridge End Farm

Julian Harris and Nicola Harris (“our Client”) are the owners of freehold land known as Land at Bridge End Farm, Ockham GU23 6NU. The extent of the ownership and land the subject of these representations is outlined in red on the attached plan.

Our Client acquired the Land at Bridge End Farm from their father, Jessel Harris on 27th December 2002. Jessel Harris retains ownership of Bridge End Farm house and lives there today.

Land at Bridge End Farm comprises agricultural land extending to approximately 14.5 hectares (36 acres) in size. The site is made up of a number of agricultural fields and numerous farm buildings and associated hard standing. Access is provided by Hatch Lane off Ockham Lane. Bridge End Farm Land has been run as a cattle farm by a local farmer since 1984.

Previous Promotion

Land at Bridge End Farm has historically been promoted through the Local Plan process in conjunction with other surrounding land, for a strategic allocation at the former Wisley Airfield. This larger land parcel has been assessed by GBC and was considered suitable for release from the Green Belt and allocation as a new urban settlement, through the evidence base for the emerging Local Plan.

Land at Bridge End Farm was originally included within a previous draft Local Plan Strategy and Sites document, but did not feature within the Local Plan Strategy and Sites consultation draft (July 2014). This was partly because Jessel Harris, in response to a letter sent to him by GBC, stated that the Bridge End Farm Land was not available. The reduction in size
of the allocation, arising from the exclusion of the Bridge End Farm Land and other neighbouring land, resulted in the potential residential yield of the allocation being reduced from 2,500 units to 2,100 units.

Representations were submitted to the July 2014 consultation, reiterating that Land at Bridge End Farm is available to be included within the Local Plan and that Our Client is promoting the land for inclusion within the wider land parcel, which is crucial for the success of the strategic allocation and development proposals.

At that time, the representations focused on the need for the strategic allocation to achieve a critical mass in relation to size and scale of development, being informed by GBC’s Green Belt and Countryside Study (Volume V April 2014), which forms part of the evidence base for the emerging Local Plan.

Representations

Our Client supports the principle of the strategic allocation around the former Wisley Airfield site, including Land at Bridge End Farm, for the creation of a new settlement. However, it is considered that the draft policy associated with the allocation should be altered to more closely reflect GBC’s supporting evidence based and take advantage of the potential development opportunity in this location. Detailed representations in this regard are provided below.

Context

The National Planning Policy Framework (‘NPPF’) sets out the tests against which Local Plans should be prepared and assessed. Local Plan policies should follow the approach of the presumption in favour of sustainable development.

The principal test guiding policy adoption is that of ‘soundness’, namely that the plan should be (NPPF paragraph 182):

- “Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and

- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.”

It is against these categories that the draft Local Plan has been reviewed and against which the following representations have been made.

Site Allocation A35: Land at Former Wisley Airfield, Ockham

The Site Allocation within the Proposed Submission Local Plan now includes a wider area than in the previous draft Local Plan, with associated Policy A35 identifying approximately 2,000 homes to be brought forward along with other employment, retail and leisure uses and supporting infrastructure. The larger allocation reflects previous representations made by Our Client and other landowners bringing forward available and deliverable sites. As highlighted above, Our Client is supportive of the principles of the now expanded allocation for a new settlement in this location. This more closely reflects the scale of land identified and assessed within the supporting evidence base for the Local Plan. However, there are additional comments Our Client would like to make, with several factors to consider, taken in turn below.

Green Belt and Country Side Study

In February 2013, Pegasus Planning Group published a Green Belt and Countryside Study on behalf of GBC, which was later updated with the addition of Volume V in April 2014. This study concludes that land parcel C18 (former Wisley Airfield site and Land at Bridge End Farm) represents an appropriate location for a new settlement and is of a size, and capable of a potential yield, to support a sustainable development in this location.
The Green Belt and Countryside Study identifies a population yield greater than 4,000 people as being capable of comprising a sustainable settlement. Therefore a population of 4,000 is not a ceiling or target, but represents an estimated minimum to assist in creating a sustainable settlement.

**Wisley Airfield Outline Planning Application**

Outline planning permission for development of a new settlement at the site of the former Wisley Airfield was refused by GBC on 8 April 2016. Refusal was predominantly on the grounds of inability to demonstrate very special circumstances to outweigh harm to the Green Belt, a policy test which will not apply should the proposed allocation in the emerging Local Plan be adopted.

This planning application sought permission for up to 2,068 residential dwellings, up to 100 sheltered accommodation units, retail, leisure and commercial uses as well as other supporting infrastructure. It is clear from the description of proposed uses at Policy 35 of the Proposed Submission Local Plan, that this has been largely informed by the scope of the outline planning application at the former Wisley Airfield site, despite the allocated land being larger than that of the outline planning application site.

**Green Belt Boundary**

The draft Policies Map accompanying the Proposed Submission Local Plan, proposes a number of alterations to the Green Belt boundary. In relation to the proposed site allocation A35, the Green Belt boundary revisions result in a larger area than the allocation being released from the Green Belt. The justification behind this is to utilise physical and permanent features to create a defensible Green Belt boundary, not including land within the Green Belt which it is unnecessary to keep permanently open, and to endure beyond the plan period. This approach reflects policy within the NPPF at paragraph 85 and Our Client is supportive of this approach, recognising appropriate Green Belt boundaries and the possibility for additional land to come forward for development to meet future development needs.

**Commentary**

In Our Client’s view, the above identified key considerations would suggest that draft Policy A35 as currently worded, does not accurately reflect provisions of the NPPF and the opportunity for sustainable development. Our Client suggests that greater flexibility is introduced to draft Policy A35 to allow for a more significant contribution of development, particularly in relation to residential dwellings, with specific reference to a higher number. The justification for this, as above, can be summarised as follows:

- The supporting evidence base for the emerging Local Plan indicates a minimum population yield that could be capable of creating a sustainable settlement in this location and focus should be for a yield in excess of this, with a larger development capable of delivering more social and community infrastructure and benefits supporting a sustainable development;

- It is inappropriate for the specifics of the allocation to be informed by the outline planning application at the former Wisley Airfield site, which relates to a significantly smaller land area. The inclusion of Land at Bridge End Farm, as well as other land, in the allocation provides the opportunity to enhance the development of a new settlement here and allows for a greater scale of development at appropriate densities, assisting in producing a higher population yield reflecting the supporting evidence base and enabling the creation of a sustainable settlement;

- Although not able to be specified in the allocation due to lack of its promotion, the additional land to be released from the Green Belt by virtue of the proposed Green Belt boundary should be recognised as providing for future development need. Draft Policy A35 should therefore include recognition of this and be informed by the proposed defensible boundary and future development potential.

In addition to the above, planning for sustainable development is enshrined within the NPPF, as well as a requirement to “boost significantly the supply of housing” at paragraph 47.

For the reasons set out above, Our Client considers that Policy A35 of the Proposed Submission Local Plan as currently drafted is unsound, as it is not:
• ‘Positively prepared’ – Additional development brought through the strategic allocation would further assist in meeting the development needs of GBC and neighbouring authorities. The development potential has not been maximised with additional land being promoted;

• ‘Justified’ – As it is not the most appropriate strategy with consideration to the principles of the evidence base and inappropriate reliance on the scope of the outline planning application; and

• ‘Consistent with National Policy’ – As it could do more to boost the supply of housing and promote sustainable development.

Conclusion

The increase in size of the Wisley Airfield allocation following the inclusion of the Land at Bridge End Farm and other neighbouring land has provided the Local Authority with the potential to provide new sustainable mixed-use development.

We do not believe the Local Authority has positively addressed the additional land and would challenge that the 2,000 units as set out in policy A35 is sufficient. Page 124 of the proposed submission plan refers to an ‘approximate 2,000’ homes and this still does not reflect the original Pegasus report 2013 whereby 2,500 homes were deemed appropriate and indeed desired to create a sustainable community.

In order to be found sound we request that the Local Authority amend Policy A35 to state that the site can accommodate approximately 2,500 homes. The exact number can then be determined through proper masterplanning of the site.

I trust that the above provides informative comments to the current consultation. I would be grateful if you could please confirm safe receipt of these representations and for above comments to be considered and included in the submission of the draft Local Plan.

In addition, we request to be kept informed on the Examination proceedings and request to reserve the ability to take part in the Examination Hearings on behalf of our client.

Please do not hesitate to contact me or my colleague Mark Novelle (020 7182 2423) should you wish to discuss any of the above further.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  Pages from Bridge End Farm - Submission Local Plan Reps Letter.pdf (160 KB)
Having reviewed the SA documents prepared by AECOM to support the Plan Bewley Homes has a significant concern regarding the overall approach taken by the Council.

Throughout the SA document there are clear statements that the Council’s chosen development strategy is flawed and will lead to fundamental problems in terms of delivery, particularly in relation to new housing. The key concerns that Bewley Homes has are set out in the bullet points below with reference to the relevant sections of the SA documents:

- **Impact on Economy** – The SA concludes that there will be significant negative effects on the economy as a result of the preferred option set out in the Plan on the basis that no contribution is being made towards meeting the unmet housing need within the HMA, which is also a FEMA. The SA offers no real justification for why this failing is not being addressed and instead states that the Council is awaiting the views of the Local Enterprise Partnership on the matter (Page 7 of the Non-Technical Summary to the SA refers). This represents a fundamental failure on the part of the Council to proceed with a Plan that has not addressed this key matter and where feedback is still outstanding from a key stakeholder.

- **Housing Delivery** – The SA documents identify in numerous locations that the Council’s preferred option does not deal with the need for delivery in the early years of the plan period and that ‘question marks’ exist. The suggested approach to dealing with these ‘question marks’ is to leave the matter for debate at the examination. In Bewley Homes’ view this is too little too late. The Council’s poor history in terms of delivery of housing speaks for itself and it is incumbent upon the Council to properly address the matter of delivery in the early years now and before the Plan proceeds to examination. The current approach leaves the Council open to challenge and the real likelihood of failure at the examination, which would be more harmful to the Borough than dealing the submission of the Plan to properly address the matter of housing delivery now.

- **Duty to Cooperate** – The Council has consciously not sought to address any shortfalls in housing delivery elsewhere in the HMA, particularly in relation to Woking and Waverley. As a consequence there is a real prospect that the housing need across the HMA will not be met. It is evident from the approach that Waverley is currently taking that it will not be seeking to meet all of its OAN through the emerging Local Plan and Woking has already confirm this position. Guildford Borough although constrained does have capacity to accommodate more than its OAN and therefore to take on some of the unmet need in the HMA. This is of vital importance and is a basic legal requirement that the Council has failed to properly address as evidenced by the SA documents. Furthermore and in terms of the proposed Wisley allocation it is clear that the Council has not properly engaged with Elmbridge Borough Council to explore and address its concerns, which in the case of harm to the Green Belt are supported by the Inspector that examined the Elmbridge Local Plan.

- **Failure to Consider Alternatives** – The SA documents refer to a series of growth options and have considered them against the required criteria. However all of the growth options are predicated on housing delivery from the same sources. In particular relation to the Green Belt no other options beyond those identified by the Council have been assessed. The Council has even removed some Green Belt sites that were considered in the previous draft of the Local Plan purely on the basis that they attracted objection. The failure to consider other site options, particularly in relation to potential Green Belt releases, is a significant flaw in the SA process. Although the SA states that only sites that have scored green or amber in the Green Belt review have been considered this is patently not true because Normand/Flexford is a red site.

The evidence that Bewley Homes has provided in this representations confirms that there are locations in the red areas that are in fact suitable for release from the Green Belt and are less harmful than locations such as Wisley, Normandy/Flexford and Blackwell Farm, which because of their relatively modest scale can make a positive contribution towards the supply of both open market and affordable housing in the early years of the plan period.

The Council’s failure to consider these alternatives has resulted in the progression of a development strategy that is flawed and will fail to meet the development needs of the Borough, particularly in the early years of the plan period.

- The SA approach is therefore flawed and requires a complete review to ensure that as the key supporting document to the Plan it is robust and accords with the requirements of the Framework and the NPPG. The Council cannot proceed to the formal submission of the Plan on the basis of the SA in its current form and to do so would result in the document being found unsound for the reasons identified above.
Policy A26 – OBJECT: UNSOUND – Not Positively Prepared, Justified, Effective or Consistent with National Policy:

The Council’s proposed allocation of land at Blackwell Farm, Hogs Back, Guildford cannot be considered as a sound land release for the following primary reasons:

- Development Scale and Sustainability: The Council is suggesting that this proposal as a site allocation will create a sustainable development however including 1,800 dwellings. Although the site is within the vicinity of the city of Guildford it is both physically and visually isolated from the urban area and firmly within the Green Belt.
- The scale of development proposed will dominate this located created a clear and harmful extension of the settlement divorced from the main urban area.
- The site will have little or no relationship with the existing urban area and its relative isolation results in an inherently unsustainable form and scale of development.
- Delivery of Essential Infrastructure: The Council identifies in the policy that ‘interventions will be required to address potential highway performance issues’. Furthermore the Council identifies additional infrastructure that will be required for the scheme to be viable and sustainable.
- Appendix C of the Plan sets out the key infrastructure required to deliver the Plan as a whole and in specific relation to Blackwell Farm confirms the following requirements:

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<th>Cost to Development</th>
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<td>New rail station at Guildford West (Park Barn) (NR2)</td>
<td>£10m developer funded with proportionate contribution from Blackwell Farm scheme</td>
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<td>Improvement works to the local road network (LRN3, LRN4 and, LRN5)</td>
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<td>LRN4 - £20m</td>
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<td>Upgrades to Foul Sewer network</td>
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<tr>
<td>Flood risk and compensation works</td>
<td>Developer to fund (not yet costed)</td>
</tr>
<tr>
<td>Provision of bespoke SANG</td>
<td>Developer to fund (not yet costed)</td>
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</table>
Open Space including playing fields
Developer to fund (not yet costed)

A new 2FE primary school with pre-school provision
Developer to provide serviced land and build costs at estimate of £8m

Community meeting hall
Developer to fund (not yet costed)

- Even taking into account those items where the Council has attributed a cost it is apparent that a development of some 1,800 dwellings cannot afford to deliver all of the infrastructure that the Council state is required to make it acceptable in planning terms as a sustainable development. The fact that the Council has not been able to quantify the majority of the works that are required also represents a failing in terms of demonstrating that the Plan will be effective in the delivery of those obligations.
- It is therefore hard to see how a scheme for 1,800 dwellings can come forward with the weight of such a heavy burden of Planning Obligations to enable its delivery.
- Impact on Green Belt: The Green Belt study undertaken to inform the preparation of the Plan confirms that this site will result in the loss of ‘yellow and red rated’ Green Belt land i.e. land that is of the medium to highest value in terms of the contribution that it makes to the objectives of the Green Belt.
- The justification for the release of such high quality Green Belt land set out in the SA (Page 27 of the main SA document refers) is that the proposal will deliver new facilities, a railway station and an extension to the Surrey Research Park. This does not amount to an appropriate justification for the release of land from the Green Belt, particularly where other more suitable locations exist that have not even been tested by the Council through its Green Belt study.
- Additionally and as set out above the level of new facilities that the Council require from the scheme is likely to render the development unviable and therefore the benefits identified as the sole justification for the release of the site will not be delivered.
- The Council’s position in promoting this site as a land allocation is therefore, in Bewley Homes’ view, completely untenable.
- The Council’s proposed allocation should therefore be deleted and further land allocated to make up the shortfall in supply.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7852
Respondent: 11458241 / Bewley Homes
Agent: Bewley Homes Plc (David Neame)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Detailed Representations in Relation to Land to the South and East of Ash and Tongham

Policy A29 - OBJECT: UNSOUND – Not Positively Prepared, Justified or Consistent with National Policy:

Bewley Homes is supportive of the Council proposing a strategic land allocation for housing to the South and East of Ash and Tongham, which is considered to comprise a suitable and sustainable location for growth that will assist the Council to meet its housing requirement in the early part of the Plan period.
Bewley Homes is however concerned that the Council has sought to remove areas of land that are for all intents and purposes within the strategic location for growth as defined on the draft Proposals Map.

In particular the areas of land identified on the plan attached at Annex 1 to these representations form an integral part of the strategic development location that can and will make a valuable contribution to the delivery of new housing in this area.

Bewley Homes has a controlling interest in the area identified on the attached plan and is therefore able to ensure its complete delivery on a comprehensive basis as part of the overall strategic development location.

Given the importance of ensuring the strategic development location is cohesive and that the individual development proposals provide connections between the sites and existing urban area (a point that Bewley Homes is particularly supportive of) it is considered vital that the whole of the area covered by the strategic development location is included in the formal allocation.

The inclusion of the areas identified will also provide greater flexibility in terms of the delivery of further housing and affordable housing in a highly sustainable location outside of the Green Belt that will strengthen the Council’s housing delivery strategy.

Bewley Homes is aware of the presence of certain Heritage Assets in the vicinity of the areas identified on the attached plan. It is considered that the presence of these Heritage Assets adds greater weight to the argument that the areas identified on the attached plan should be included within the strategic development location. Their inclusion will ensure that through a comprehensive masterplanning exercise for the area under Bewley Homes’ control the Heritage Assets can be properly protected as part of any future development.

Finally it is important to note that the approach being taken by the Council will bring the areas identified into the defined urban area of Ash and Tongham in any event, wherein the principle of development will become acceptable. It is therefore logical that these areas are included within the strategic development location to ensure proper positive planning of the area rather than leaving their future development potential solely to the Development Management process.

The draft proposals map should therefore be amended to include the areas of land identified on the attached plan within the strategic development location.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

Policy A35 – OBJECT: UNSOUND – Not Positively Prepared, Justified, Effective or Consistent with National Policy:

The Council’s proposed allocation of land at former Wisley airfield, Ockham cannot be considered as a sound land release for the following primary reasons:

- Development Scale and Sustainability: The Council suggests that this proposal will create a new settlement (see Spatial Vision) yet the residential component only comprises 2,000 dwellings. A development of 2,000 dwellings is insufficient in terms of its scale to provide a large enough population to sustain the new services and facilities that would need to be provided alongside housing and employment.
- It has been long established in the planning system that the creation of new settlements requires a nucleus of population of sufficient size to ensure that the associated services and facilities can be funded and provided and then maintained in a viable manner.
- Many examples exist of new settlement development and all of those that have succeeded require greater levels of housing than the Council is currently proposing.
- Although a little dated now in terms of its publication date the Town and Country Planning Association (“TCPA”) produced a document in 2007 in conjunction with the DCLG that reviewed Best Practice in relation to Sustainable Urban Extensions and New Settlements.
- The review reached a number of key conclusions those of direct relevance to the Council’s proposal are summarised below:
  - The decision making in relation to the provision of a new settlement is not something that can or should be taken at a local authority level. The strategic nature of such a decision renders it necessary to consider at a more strategic level to ensure that cross boundary issues with neighbouring authorities are properly considered and catered for;
  - New settlements have a long lead in time that is typically 20 years i.e. the whole plan period; and,
  - Significant initial investment is usually required to bring forward the substantial infrastructure that is typically required.
- The Council is therefore proposing a new settlement unilaterally at a local level and without proper recourse to neighbouring authorities (Neame Sutton is aware of a number of authorities that border Guildford Borough that are objecting to this proposal).
- The Council is suggesting that the 2,000 dwellings on the site will be delivered in years 1 -15 (Table 1 refers) yet typical delivery from such proposals is 20 years.
- The scale of the proposal is too low to ensure the necessary infrastructure requirements can be bought forward in a viable manner.
- For these reasons the draft allocation proposal is inadequate in scale and inherently unsustainable.

Delivery of Essential Infrastructure:

- The Council identifies in the policy that ‘interventions will be required to address potential highway performance issues.’ Furthermore the Council states that regard will need to be had to the delivery and timing of key infrastructure.
- Appendix C of the Plan sets out the key infrastructure required to deliver the Plan as a whole and in specific relation to Wisley confirms the following requirements:

<table>
<thead>
<tr>
<th>Infrastructure Required</th>
<th>Cost to Development</th>
</tr>
</thead>
<tbody>
<tr>
<td>Improvement works to the strategic road network (SRN1, SRN2, SRN3)</td>
<td>A proportion of the following: SRN1 - £2m SRN2 - £100 - £250m SRN3 - £100 - £250m</td>
</tr>
<tr>
<td>Improvement works to the local road network (LRN7)</td>
<td>£25m</td>
</tr>
<tr>
<td>Bus interchange</td>
<td>£0.25m</td>
</tr>
<tr>
<td>Significant bus network</td>
<td>To be confirmed</td>
</tr>
<tr>
<td>Off site cycle network</td>
<td>To be confirmed</td>
</tr>
<tr>
<td>Upgrades to water supply network</td>
<td>To be confirmed</td>
</tr>
<tr>
<td>Upgrades to foul sewer network</td>
<td>To be confirmed</td>
</tr>
</tbody>
</table>
Flood risk and compensation works  To be confirmed
A new two form entry primary school  Land plus significant proportion of £8m cost
A new four form entry secondary school  Land plus significant proportion of £15m cost
Delivery of Bespoke SANG  To be confirmed
Neighbourhood Policing Centre  £100k

- Even taking into account those items where the Council has attributed a cost it is apparent that a development of some 2,000 dwellings cannot afford to deliver all of the infrastructure that the Council state is required to make it acceptable in planning terms as a sustainable new settlement. The fact that the Council has not been able to quantify the majority of the works that are required also represents a failing in terms of demonstrating that the Plan will be effective in the delivery of those obligations.
- It is therefore hard to see how a scheme of 2,000 dwellings will ever come forward on the land let alone within the 20 year time horizon of the Plan that has in effect only 17 years left to run.

Planning History:

- The Council has recently determined an Outline Application on the site for circa 2,000 dwellings, which was refused permission on 08 April 2016 (Decision Notice attached at Annex 1).
- The decision notice confirms the following concerns raised by the Council’s Planning Committee:
  - The scale of development would have a clear and substantial detrimental impact on the openness of the Green Belt;
  - No evidence to demonstrate the scheme would not give rise to severe adverse impact on the safe and efficient operation of the strategic road network;
  - Impact on the viability of existing district and local centres in the vicinity;
  - Impact on safeguarded waste site;
  - The quantum and scale of development is unacceptable;
  - Impact on listed buildings;
  - Impact on air quality; and,
  - A range of matters relating to Planning Obligations.
- It is clear from the decision that the Council’s own Members share the same concerns as Bewley in relation to the viability and deliverability of the development in this location together with raising additional concerns in relation to its impact on the Green Belt and the character of the area.
- If this is the view of Council Members it seems perverse that the Council has continued with the proposed allocation of the land given that the delivery of circa 2,000 dwellings has been tested more thoroughly through the planning application process and found to be significantly lacking.

Furthermore, and as document in the SA (Page 20 of the main SA document refers) neighbouring Local Planning Authorities have also raised serious concerns in relation to the proposed allocation of this site in the Plan. In particular Elmbridge Borough Council has highlighted the vulnerability of the Green Belt in this location as confirmed by the Inspector appointed to examine the Elmbridge Core Strategy.

The Council’s proposed allocation should therefore be deleted and further land allocated to make up the shortfall in supply.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17287</th>
<th>Respondent: 11458241 / Bewley Homes</th>
<th>Agent: Bewley Homes Plc (David Neame)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy D1 – OBJECT: UNSOUND – Not Positively Prepared or Justified:

The Council has included this policy within the Plan, which is clearly worded as a Development Management policy. Bewley considers that the inclusion of such a policy is not warranted at this stage given the clear intention set out by the Council to deal with Development Management policies in a separate Development Plan Document.

In any event the wording of the policy is overly restrictive in that it states that developments of 25 dwellings or more ‘must’ comply with all of the bullet point criteria listed. This approach fails to recognise the individual merits of development proposals and the fact that not every scheme will be able to, or indeed should, comply with all of the criteria listed in their entirety.

It is therefore considered that the policy should be deleted from the Plan and included in the later Development Management document in due course. If however the policy is to remain the wording of the introductory sentence should be amended to read as follows:

Residential developments of 25 or more dwellings should’

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/17286</th>
<th>Respondent: 11458241 / Bewley Homes</th>
<th>Agent: Bewley Homes Plc (David Neame)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</td>
<td></td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H2 – SUPPORT WITH RESERVATION:

Whilst Bewley is supportive of the Council’s approach to the identification of an affordable housing requirement and that the level sought (40%) is generally accepted as comprising an appropriate amount having regard to development viability this does further demonstrate the importance of a development strategy that delivers housing in the early years of the plan period. The reason for this view is that the October 2015 SHMA identifies a need equating to some 66% of the total OAN. Where the Council is seeking to adopt a policy requiring 40% on sites of five or more homes the level of affordable housing need identified in the SHMA will never be fully met. Early delivery to help secure affordable provision as soon as possible is therefore vitally important within the Borough.

Paragraph 4.3.13 – OBJECT: UNSOUND – Not Positively Prepared, Justified or Consistent with National Policy:

Bewley does support the release of settlements from the Green Belt and in turn the proposed allocation of new housing land in or immediately adjacent to these settlements. However, and for the reasons explained in the representations below, the
Council needs to release further land from the Green Belt to meet its housing obligations and ensure flexibility in its development strategy for the whole of the plan period.

The Green Belt and Countryside Study prepared by Pegasus on behalf of the Council in January 2013 clearly identifies significantly more capacity within the Green Belt for land release than the Council has sought to include within the Plan. Furthermore the Green Belt and Countryside Study has taken an extremely narrow approach to the review of the Green Belt boundaries and as a consequence has missed a number of viable opportunities for land to be released for housing that would not cause material harm to the objectives of the Green Belt.

The need for further land release is set out below.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Policy S1 – SUPPORT WITH RESERVATION:**

Bewley is supportive of the Council seeking to import the general presumption in favour of sustainable development set out at paragraph 14 of the Framework into the Development Plan. This approach has been followed by many other Local Planning Authorities in the Country and will provide a sound basis for decision making in the Borough if applied correctly at the Development Management stage.

Bewley would however recommend that the Council also includes the reference within the first sentence of Paragraph 49 of the Framework, which reminds decision makers that proposals for residential development should be considered in the context of the presumption in favour of sustainable development.

The addition of this reference would ensure the policy properly reflects the Framework and will assist the Council in proactive decision making during the life of the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/17282  **Respondent:** 11458241 / Bewley Homes  **Agent:** Bewley Homes Plc (David Neame)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>1) Introduction:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. This paper sets out representations on behalf of Bewley Homes Plc (“Bewley”) in respect of Guildford Borough Council’s proposed submission draft Local Plan Regulation 19 consultation (“the Plan”).</td>
</tr>
<tr>
<td>2. For ease and consistency these representations are presented in two parts. The first part sets out Bewley Homes’ representations in relation to the Plan as drafted. The second part (see separate volume) provides detail on a proposed alternative housing site that Bewley considers should be allocated at part of the Local Plan to ensure the Council meets its housing obligations over the plan period.</td>
</tr>
<tr>
<td>3. The individual components of the plan are identified throughout where comments are being made. A separate consultation response proforma has been prepared for each individual representation and is submitted alongside this document.</td>
</tr>
<tr>
<td>4. In terms of format the remainder of this document identifies the relevant paragraph or policy reference within the proposed submission document where representations are being made and confirms whether Bewley is raising objection or support together with which soundness tests or legal compliance issues are being raised.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>2) Spatial Planning Context and Housing Delivery</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. As a starting point it is considered important to set the background against which the current draft Local Plan is being prepared within Guildford Borough.</td>
</tr>
<tr>
<td>2. The current adopted Local Plan was adopted on 09 January 2003 and provided a planning framework for the period up to 2006. The adopted Local Plan is therefore time expired and has been so for a period of 10 years.</td>
</tr>
<tr>
<td>3. The Council’s progress on the preparation of a new Local Plan over this 10 year period has been woefully inadequate. As a consequence of the vacuum created by a lack of up-to-date policy within the Borough the Council’s capability to maintain an adequate supply of deliverable housing land has been severely hampered.</td>
</tr>
<tr>
<td>4. Until recent years and, in particular the publication of its Strategic Housing Market Assessment in 2014, the Council has not even been in a position to confirm the state of its housing land supply shortfall.</td>
</tr>
<tr>
<td>5. The Council’s current stated housing land supply position set out in its Annual Monitoring Report dated October 2015 confirms that it has at best a 2.4 year supply with a 20% buffer.</td>
</tr>
<tr>
<td>6. This extremely low level of supply is also only based on an assessment base date of 2013 i.e. it fails to take on board the persistent history of failure over the preceding years since the expiry of the previous Local Plan in 2006.</td>
</tr>
<tr>
<td>7. The reason for highlighting the matter of the Council’s extremely poor record in terms of both plan making and housing delivery is that any new Local Plan should place its emphasis not only on seeking to meet the full Objectively Assessed Needs (“OAN”) identified for the Borough but should also look to ensure that a significant proportion of that requirement is supplied in the early years of the plan period.</td>
</tr>
<tr>
<td>8. This approach is further reinforced by the upward trend in need that is demonstrated by the most recent population data published by the Office of National Statistics (ONS) on 26 May 2016 in relation to migration trends. This data has identified that net long term migration is now at its highest in the UK for over 10 years at +333,000. Whilst this does not specifically confirm that further housing will be required in Guildford Borough it is a clear indication that the pressure for new housing across the UK and in the South East region in particular will continue to increase.</td>
</tr>
<tr>
<td>9. It is this kind of symptom that the Government is seeking to treat through its National policy requirement to significantly boost the supply of new housing and a focus on the presumption in favour of sustainable development.</td>
</tr>
<tr>
<td>10. Furthermore the Council’s position in terms of affordable housing need as confirmed in its October 2015 SHMA increases the importance of the timely delivery of housing across the Borough. The SHMA records a need of some 456 dpa for affordable housing, which equates to 66% of the total OAN of 693 dpa.</td>
</tr>
<tr>
<td>11. With this background in mind the remainder of this section of the representations provides specific comments on the various paragraphs and policies within the</td>
</tr>
</tbody>
</table>
Plan,

Paragraph 1.3 – OBJECT: UNSOUND – Not Positively Prepared, Justified or Consistent with National Policy:

12. The Council states in this paragraph that the Plan contains overarching policies and allocates land for housing, employment, community facilities and other types of development. It goes on to state that the second part of the Local Plan (which is yet to be prepared) will deal with the detailed development control policies.

13. On that basis it is incumbent upon the Council to ensure that the Plan does indeed allocate all land that is necessary to meet its housing and other development obligations.

14. For the reasons that Bewley has set out in this document it is clear that there are fundamental flaws in the Plan as drafted as well as a number of the strategic land allocations that will result in the document both being unsound and unable to meet the development needs of the Borough.

15. The approach the Council is taking in dealing with all land allocations in the Plan is laudable but does therefore mean that there are no second chances in terms of meeting any shortfall created by the failure of any one or a number of its land allocations within the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17285  Respondent: 11458241 / Bewley Homes  Agent: Bewley Homes Plc (David Neame)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S2 – OBJECT: UNSOUND – Not Positively Prepared, Justified or Consistent with National Policy:

Bewley is supportive of the fact that the Council is seeking to plan for the whole of its OAN as identified in the October 2015 version of its SHMA. This is the correct approach to take and is in conformity with National policy set out in the Framework (Paragraph 47) and the NPPG in the circumstances where, as is the case in Guildford Borough, the level of constraints do not justify a reduction in delivery against the OAN.

The above positive point within the policy is however offset by the housing trajectory set out in the table that forms part of the policy wording. It is clear that the Council is continuing with its trend of “putting off this year what can be dealt with in future years”.

Given the historic failure of the Council to deliver housing over a sustained period in the 10 years between the expiry of the old Local Plan and the present day and the extremely low level of supply currently in place the Council should be seizing the opportunity afforded by the new Local Plan to proactively deliver housing in the early years of the plan period.

The current trajectory seeks to push the majority of the housing delivery for the Borough in the second half of the Plan period i.e. from 2023 onwards. In fact the trajectory does not provide any delivery figures at all for the first five years of the plan period from 2013 – 2018.
The Council is therefore embarking on a strategy that will push back delivery of much needed housing to the later stages of the plan period.

This approach, which is predicated on the delivery of major development locations that are by their nature slow to deliver, will further exacerbate the current shortfall in supply and fail those most vulnerable members of the community in need of affordable housing. Additionally the major development locations identified by the Council all have significant constraints that need to be addressed before any new dwellings can be delivered.

Whilst the Council has identified that its housing requirement is ‘not a ceiling’ and that earlier delivery of allocated sites will be supported where appropriate such a reliance on the ‘hope’ that sites will come forward rather than positively planning for early delivery is simply unacceptable and fails to meet the test of being positively prepared and in conformity with National policy.

The Council’s development strategy for the delivery of new housing across the Borough is therefore inherently flawed and either a significant change is required that moves away from major development locations or further land is allocated to enable delivery in the early years of the plan period whilst the major development locations come up to speed.

In either scenario further land allocations should be made in sustainable locations, which the Council’s evidence base already confirms are available (see representations below).

It is perhaps rather telling that the Council is aware of the significant shortcoming in its development strategy for the delivery of housing by the fact that Policy S2 is the only policy in the document that is not supported by a reasoned justification. This in Bewley’s view is because there is no reasoned justification for the development strategy the Council is seeking to pursue in the face of the clear and compelling evidence that housing should be prioritised in the early years of the plan and that capacity exists in locations that are capable of delivering in a sustainable manner.

Bewley Homes’ concerns with the delivery strategy that the Council is pursuing are supported by the conclusions of the Sustainability Appraisal (“SA”) undertaken by AECOM to support the Plan. In particular the SA notes (Page 9 of the Non-Technical Summary and Second paragraph of Page 29 of the main SA document refer) that there are question marks regarding the housing trajectory (and in particular the supply of housing in the early part of the plan period). The SA goes on to state that these are detailed matters that will benefit from open discussion during the plan’s examination.

The approach advocated by the SA to leave the debate on delivery until the examination is itself fundamentally flawed. The Council should be in a position where it progresses to the submission stage with a Plan that can deliver the required level of housing consistently across the plan period without any ‘question marks’. Given the significant shortfall in supply currently and the backlog of unmet need in the District certainty of delivery in the early years is paramount to the success of the Plan.

The ‘question mark’ identified by the SA on its own is enough to demonstrate that the Plan fails the tests of soundness and cannot proceed to examination.

The development strategy should therefore be changed to ensure that housing is being proactively delivered in the early stages of the plan period rather than the current approach that will reinforce the Council’s position in terms of failing to deliver.

The housing requirement identified (693 dpa) must be regarded as a minimum and draft Policy S2 must be amended to clearly state this. In addition the Council should be allocating further land on small to medium sized sites that can deliver in the short term to address its significant backlog in need and to rectify the current shortfall in housing land supply. Given the Council’s persistent failure to deliver new housing over the last decade or more the very least that the Council should be planning for is a 20% buffer over and above the total housing requirement generated by the OAN. The SA report currently confirms the Council is planning for a 14% buffer, which is inadequate and, will lead to failure.

A minimum requirement of 832 dpa should therefore be planned for by the Council, which would equate to a total requirement of 16,640 dwellings over the 20 year plan period i.e. an increase of 2,780 dwellings.

Allocation of these additional dwellings on small to medium sized sites, such as that promoted by Bewley Homes, will provide the necessary flexibility to ensure that the Council can maintain a rolling 5 year supply of deliverable housing sites.
and most importantly that it will deliver housing in the early years of the plan period to help rectify the significant backlog of unmet demand.

**Table 1 - OBJECT: UNSOUND – Not Positively Prepared, Justified or Consistent with National Policy:**

Bewley Homes objects to the Council’s inclusion of a windfall allowance within Table 1 equating to 625 dwellings over the period 2018 – 2033.

Given the Council’s history of persistent failure to deliver housing it is considered that any reliance upon windfalls in the Plan is unsound. The Council should be planning positively to ensure that sufficient land is identified to meet its OAN as a minimum and should not be relying upon windfalls to make up the numbers where the history of delivery has been so poor.

It is considered that windfalls should therefore be removed from Table 1 and regarded as an additional ‘bonus’ over and above the planned delivery to meet the minimum OAN.

This approach would accord with Government policy contained in the Framework at Paragraphs 47 and 48 and supplemented by the advice in the NPPG at Paragraph: 24 Reference ID: 3-24-20140306.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17368  **Respondent:** 11458241 / Bewley Homes  **Agent:** Bewley Homes Plc (David Neame)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Detailed Representations in Relation to Effingham**

Having provided representations in relation to the Plan as drafted and the accompanying SA (see Part 1 of Bewley Homes’ representations) this section sets out Bewley Homes’ proposal for the allocation of land at Hester’s Yard, Wood Street Village as a sustainable location immediately adjacent to the settlement. The proposal is supported, where relevant, by appropriate detailed technical evidence primarily in relation to the following matters:

- Landscape and Visual Impact and Green Belt
- Highways and Transportation Matters
- HDA
- Motion

As a starting point it is important to highlight that Bewley is supportive of the Council’s identification of Wood Street Village as a sustainable location and as a consequence the proposal to remove the settlement from the Green Belt.
This section focuses on Bewley’s objection to the Plan on the basis that further greenfield housing sites are required to deliver the housing necessary to meet the OAN and most importantly smaller sites should be allocated to enable delivery in the early years of the plan period together with ensuring flexibility.

Furthermore and for the reasons Bewley has identified above there are fundamental flaws in the Council’s proposals to allocate 2,000 dwellings at Wisley and 1,800 dwellings at Blackwell Farm. The removal of these two allocations would place greater importance on the identification of other suitable and sustainable locations in the Borough to meet the overall housing need. Notwithstanding this point there is a need for the allocation of further sites to ensure sufficient flexibility in terms of supply of housing throughout the Plan period and to enable the Council to respond positively to changes in demand and delivery without needing to revert to a review of the Local Plan.

As set out in Part 1 of Bewley Homes’ representations the Council has not undertaken a full review of all suitable and available alternatives nor has its consultants explored other options for release from the Green Belt. As a consequence the Council has simply decided not to make any provision for growth to meet the needs of the community at all throughout the plan period within Wood Street Village.

The Council’s approach in this regard is without foundation and based on flawed evidence.

As demonstrated in the attached appraisals (and explored below) land at Orestan Lane represents a viable location for a relatively limited release of land from the Green Belt to provide a scale of development that is appropriate and proportionate to the size of the settlement, which the Council itself acknowledge as a sustainable location.

As identified in Part 1 of Bewley Homes representations the Council’s current development strategy fails to ensure delivery in the early years of the plan period to meet the needs of the Borough’s population in terms of new housing. There is a need for the release of more modest scale housing sites in sustainable locations, such as Wood Street Village, that can deliver housing in the first 5 years of the Plan period in particular. Equally the Council’s current approach fails the residents of Wood Street Village in terms of meeting their needs for further open market and affordable housing.

As confirmed in the Council’s own Settlement Hierarchy Study (May 2014) Wood Street Village is regarded as a Large Village, which is the third tier in the settlement hierarchy below the Rural Service Centre of East Horsley and the Urban Area of Guildford, Ash and Tongham. Wood Street Village is therefore a suitable and sustainable location for accommodating a modest scale of growth in the manner proposed by Bewley Homes in these representations.

Turning to consider Bewley Homes promotion site. Land at Orestan Lane, Effingham is considered to comprise a suitable location for release from the Green Belt and allocation for approximately 40 dwellings to help deliver the Council’s housing requirement for the following reasons:

**Location and Context:**

The proposed allocation site is situated immediately adjacent to the currently proposed boundary for the settlement of Wood Street Village and the front section of the site is actually within the settlement and benefits from a direct road frontage onto Oak Hill. As set out above Wood Street Village comprises a sustainable location for growth as identified by the Council in its settlement hierarchy. The Council’s regard for the sustainability of the settlement is reflected in its desire to roll back the Green Belt boundaries in the Plan.

The promotion site itself comprises a variety of commercial uses including open storage, vehicle repairs and servicing. The site is predominantly previously-developed land in accordance with the definition set out in Annex 2 of the Framework.

Given the emphasis that the Council is placing upon the release of previously-developed land to meet its housing requirement this promotion site is considered to comprise just the kind of location that should be allocated in accordance with Paragraph 4.1.6 of the Plan that states:

Our preference is to focus growth in the most sustainable locations, making best use of previously developed land (including in the Green Belt if appropriate).

In both physical and visual terms the site relates well to the settlement and appears as part of the settlement when viewed on the ground.
The site benefits from direct access to local services and facilities as set out in the attached Transport Accessibility Appraisal prepared by Motion.

**Contribution to Green Belt and Landscape and Visual Impact:**

Having established that Wood Street Village is considered to comprise a sustainable location for growth and that the promotion site is well related to the settlement the next key consideration is the matter of the contribution that the site makes to the Green Belt alongside more general landscape and visual impact issues.

It is relevant to note that the Council’s Green Belt and Countryside Study undertaken by Pegasus in January 2013 did not assess the promotion site when consideration was given to Wood Street Village. No conclusion has therefore been drawn on behalf of the Council as to the contribution the promotion site may make to the Green Belt.

To address this matter Bewley has instructed its landscape architect EDP to undertake a review of the contribution the site makes to the Green Belt and also more general landscape and visual impact issues. A copy of the review is attached at Annex 2.

In summary the review concluded the following:

‘This review provides a clear indication that the site is entirely suitable for extraction from the Green Belt, without resulting in any adverse effects on the Green Belt function as identified within the NPPF, or on the local landscape character or the amenity of local visual receptors. This results primarily from the clearly demarcated boundary features, existing commercial uses within the site, the enclosed nature of the site and the consequential limitation in landscape and visual effects, but also the way in which the site is severed from the key area providing openness between Wood Street Village and Fairlands.

A development which seeks to address the constraints of the site, would contribute to retaining the openness of the Green Belt by providing much needed housing on a site where Green Belt function would not be comprised, whilst also providing a sustainable and high quality development which links very well to the existing village.’

It is therefore evident that in terms both of the Green Belt and landscape and visual impact matters the promotion site is acceptable and should be released for housing.

**Transport and Highway Impacts:**

In relation to transport and highway impacts the technical appraisal undertaken by Motion confirms that adequate vehicular access can be achieved to the site from Oak Hill in accordance with the requirements set out in Manual for Streets.

The site is well located in terms of local community facilities that can be accessed via a range of transportation modes in accordance with the requirements of the Framework and the NPPG.

The site is therefore sustainably located in relation to existing services and facilities within the settlement of Wood Street Village.

**Flooding and Drainage:**

The whole site is within Flood Zone 1 on the Environment Agency’s indicative flood mapping and is not identified as being at risk from any known surface water flooding events. In this respect the site is sequentially preferable in flood risk terms. Furthermore the site is sequentially preferable when compared with a number of other locations such as Land at Wisley and Normandy/Flexford both of which contain land in Flood Zones 2 and 3.

There are no known land drainage issues on the site and in this respect a Sustainable Urban Drainage System (“SUDS”) could be employed as part of any development on the land.

**Other Technical Considerations:**
Other technical considerations such as ecology, archaeology, arboriculture, noise, etc are not considered to pose a constraint to the development of the site for housing such as to preclude the favourable consideration of the site as a housing allocation.

The Approach to Allocation – Presumption in Favour of Sustainable Development:

Taking into account Bewley's representations that consider the need for the allocation of additional sites to ensure the Council can deliver housing in the early years of the plan period combined with the flaws in at least two of its large scale allocations there is a clear and present need for the inclusion of this site for housing in the Local Plan.

The Government emphasis in national Policy is centre on the presumption in favour of sustainable development. Paragraph 7 of the Framework identifies the three strands of sustainable development as comprising the economic, social and environmental strands. If these can be met then there is a clear presumption in favour that should lead to the natural conclusion the land should be allocated for housing.

**Economic** – The delivery of new housing on the promotion site will secure local employment in the short term during the construction phase, which is now a well-established and accepted benefit of residential development. Additionally any new residential development will contribute to the local economy in terms of Planning Obligations and via other means such as future Council tax revenues, new homes bonus and indirectly through increased revenue into the local economy. The economic limb is therefore met by the promotion site

**Social** – As set out earlier within Bewley’s representations there is a clear and present need for new housing in the Borough now to meet the substantial shortfall in supply and to ensure that the OAN can be delivered year on year from the start of the plan period rather than from half way through it. Additionally the Council’s SHMA identifies substantial affordable housing need that cannot ever be met in the life of the new Plan based on the proposed affordable housing policy approach. Finally the Council’s proposed reliance upon strategic development, particularly at Wisley and Blackwell Farm, is likely to lead to failure in terms of delivering the overall housing requirement where the Council is reliant upon every source of supply to deliver in order to meet its OAN.

Therefore any proposals of more modest scale that can deliver a range of open market and affordable dwellings in a timely manner will result in social benefit in terms of helping to meet the clearly identified needs and providing the Council with a buffer of additional housing to help safeguard against non-delivery elsewhere

**Environmental** – It has been demonstrated through the detailed review undertaken by HDA that the site can be released from the Green Belt without causing any unacceptable harm either in Green Belt or landscape and visual impact terms. Furthermore the site is accessible to local services and facilities, integrates well with the settlement and, will not give rise to any undue adverse impacts on the local highway network. The environmental limb is therefore met by the promotion site.

For all of the above reasons it is considered that Land at Orestan Lane, Effingham comprises a sustainable location for the allocation of approximately 40 dwellings that will assist the Council in ensuring its housing delivery obligations are met and that most importantly delivery of the right level of housing takes place early in the plan period.

Bewley therefore considers that for the Plan to be found sound further land allocations are required and Land at Orestan Lane, Effingham comprises a sustainable option that is available for immediate delivery. The site should be allocated for housing, included within the settlement and removed from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Neame Sutton Limited acting on behalf of Bewley Homes Plc is proposing a number of additional and/or alternative housing allocations in various settlements in the Borough. Furthermore fundamental objections are raised in relation to the Council’s housing delivery strategy including in specific relation to a number of proposed allocations and, the total number of dwellings it is proposing to provide over the Plan period. Objections are also raised in relation to the evidence base, particularly the Sustainability Appraisal and Green Belt Study.

These are all complex issues that Bewley Homes would wish to address the Inspector directly on at the appropriate Examination sessions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Bewley Homes' representations in relation to the Plan as a whole and specific paragraphs, policies and proposals are set out in the attached representations documents that clearly identify those sections of the Plan that Bewley Homes consider to either fail to be legally compliant, are unsound, or fail the duty to cooperate. In relation to the tests of soundness these are identified in bold against each section of the Plan that Bewley Homes is making representations against.

Neame Sutton Limited wishes to participate in the Examination on behalf of Bewley Homes Plc to expand upon its representations contained in the attached documents specifically (but not limited to) the following matters:

- The content of the SA
- The total housing requirement being planned for
- The housing delivery strategy
- The Green Belt boundary review process
- Bewley Homes' proposed additional housing

Further detail is set out in the attached representations documents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/17283  Respondent: 11458241 / Bewley Homes  Agent: Bewley Homes Plc (David Neame)
Document: Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition
Spatial Vision - OBJECT: UNSOUND – Not Positively Prepared, Justified or Consistent with National Policy:

Whilst Bewley is supportive of some elements of the spatial vision such as the proposal deliver 13,860 dwellings over the plan period, which meets exactly with its OAN, there are a number of fundamental issues in terms of the delivery of that requirement in the spatial development strategy that the Council is seeking to pursue.

As a consequence, and for the reasons set out in more detail in the representations below, the Plan has not been positively prepared, is not justified by the evidence base and fails to be consistent with National Policy.

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A29 – OBJECT: UNSOUND – Not Positively Prepared, Justified, Effective or Consistent with National Policy:

2.67 Whilst Bewley Homes supports the allocation of land at Ash and Tongham for housing, as per the previous representations submitted in relation to the earlier Regulation 19 consultation, the revisions made to the policy in the current iteration of the Plan raise a number of fundamental issues, which are explored below.

Housing Numbers Included in Allocation:
2.68 When compared with the previous iteration of the draft policy the total number of dwellings proposed appears, on face value at least, to have increased. This is however not the case when the detail of the approach now being taken by the Council is explored.

2.69 The amendments to the draft allocation reintroduce areas that already benefit from planning consent that were previously excluded from the allocation and therefore the total number of dwellings proposed. When the areas of consented sites are discounted from the total allocation proposed the residual from the allocation is approximately 1,025 dwellings, which compares with the previous allocation figure of 1,200 dwellings. Consequently the Council’s proposed housing provision from this allocation has actually reduced by nearly 200 dwellings.

Current Consented Sites – Ash and Tongham Allocation

| Land South of Ash Lodge Drive | 400 dwellings |
Foreman Park 26 dwellings
Kingston House 35 dwellings
Minley Nursery 55 dwellings
Ash Green Lane West 26 dwellings
Land adjacent to Grange Road 50 dwellings
Land south of Guildford Road 54 dwellings
Land at 109 South Lane 21 dwellings
Warren Farm, White Lane 58 dwellings
TOTAL 725 dwellings

2.70 This does not represent a positively planned approach particularly given the acute need for new housing in Guildford Borough and the fact that the Ash and Tongham allocation comprises the only major area outside of the Green Belt that is sustainably able to deliver further housing.

2.71 In short the Council is not seeking to make the most of this precious land resource, which fails to accord with government guidance and is consequence not justified.

Requirement for New Road Bridge (Criterion (9)):

2.72 The introduction of this Criterion into the policies corresponds with the proposed deletion of draft Policy A30. Bewley Homes raises serious concerns with the introduction of this Criterion for the following reasons:

2.72.1 Not Justified/Necessary – The Council has not presented any evidence either as part of the policy or in any supporting documentation to justify why a bridge over the railway in Ash is required either as part of the housing allocation or in isolation.

2.72.2 The Council has not undertaken any work to determine whether the impact arising from the allocation of additional housing in Ash and Tongham would give rise to a ‘severe’ cumulative impact as required by Paragraph 32 of the Framework such that mitigation to the railway crossing would be required. Following on from this would need to be an assessment of options in the event that mitigation was required. This has not been done.

2.72.3 Not Reasonable/Feasible – In the event that a bridge is required, which the Council simply does not have the evidence to determine, there is no assessment by the Council or the Highway Authority to confirm that it would be feasible either in engineering or practical terms.

2.72.4 Not Viable - The policy requires the delivery of both land and the bridge to be provided via the residential development of the Ash and Tongham allocation. No financial viability has been undertaken to determine how much the bridge would cost to deliver and consequently how much the residential development would be expected to pay to determine whether the costs are reasonable related in scale and kind to the residential development proposed.

2.72.5 As a confirmation of Bewley Homes’ concerns in relation to this point the fact that 725 dwellings have already been granted consent in the allocation area leaving only 1,025 dwellings remaining of which a further 647 dwellings are the subject of live planning applications means that the pool of available dwellings against which the costs of delivering a bridge can be levied via a Planning Obligation is relatively small. No highway concerns relating to the railway crossing have been raised by the Highway Authority in relation to the 725 dwellings already consented and it would therefore appear highly unlikely that the
Council would be able to justify the delivery of such a significant piece of infrastructure from the remaining 1,025 dwellings (net of 308 dwellings when existing live planning applications are removed).

2.73 For these reasons the proposal for a bridge as part of this allocation completely fails all of the Statutory tests set out in Regulation 122 of the Community Infrastructure Levy Regulations 2010.

2.74 It is also understood that the Council intends to collect financial contributions for the delivery of the bridge via Planning Obligations rather than Community Infrastructure Levy. Given the number of individual ownerships/promoters all active within the Ash and Tongham allocation area the approach the Council proposes will fail to meet the requirement of Regulation 123 of the Community Infrastructure Levy Regulations 2010 and consequently would be unlawful.

2.75 Furthermore the fact that the Council has deleted draft Policy A30 and not replaced this area within Policy A29 raises significant doubt on whether there is actually sufficient land within the scope of the allocation to deliver a bridge even if all of the above matters can be satisfactorily demonstrated by the Council. There is no justification given for the deletion of draft Policy A30 and given that Criterion (9) does not replicate the deleted policy this increases the doubt on the Council’s case for its inclusion.

2.76 The introduction of this Criterion within the draft Policy at this late stage in the process and its lack of detail in terms of the actual bridge proposal raises a serious issue in that the Council cannot possibly contend the proposal has been the subject of SA. The simple fact is the Council has not undertaken any work to determine whether the proposal is necessary and how it can be delivered against which a credible SA could be provided.

2.77 In this regard this element of the draft policy fails not only the tests of soundness in terms of not being justified, positively prepared, effective or in compliance with National policy but also fails the legal test in terms of not having been the subject of SA.

2.78 The policy therefore needs to be reworded as follows:
1. To remove Criterion (9) because there is no justification for a bridge to be provided;
2. To increase the overall housing allocation in the area to make best use of this highly sustainable location outside of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5173  Respondent: 11458241 / Bewley Homes  Agent: Neame Sutton Limited (David Neame)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A35 – OBJECT: UNSOUND – Not Positively Prepared, Justified, Effective or Consistent with National Policy:

2.79 Given that this Regulation 19 consultation is targeted on the amendments made by the Council Bewley has reviewed the amendments to this policy and all of its concerns as set out in its representations from June 2016 remain unresolved.

3.0 Representations in Relation to the Sustainability Appraisal ("SA")
3.1 On the basis that there is direct overlap between the representations set out in Section 2 above and the SA the comments in this section are limited to Bewley Homes’ specific concerns with the updated SA.

3.2 The SA confirms on pages 26 and 27 that there is an unmet need in the HMA arising from working amounting to 3,150 dwellings. Box 6.8 even confirms the Council’s understanding that ‘there is little reason to suggest that the Waverley Local Plan will provide for any of Woking’s unmet needs.’

3.3 The SA then accepts the need to consider options that meet some or all of Woking’s unmet need, which must be the right approach to take.

3.4 This is of course, for the reasons set out in Section 2 above, completely at odds with the actual approach taken by the Council in the Plan that singularly ignores the unmet need arising from Woking.

3.5 The SA and the Plan are therefore in direct conflict with one another over this important matter, which cannot be considered to meet with the tests of soundness particularly in terms of being justified, positively prepared or in accordance with National policy and guidance.

3.6 Table 7.1 on Page 39 summarises the options the Council has considered and identifies at Option 8 and OAN plus 27% uplift scenario. This option is the closest in terms of alignment with the correct OAN identified in Section 2 of these representations.

3.7 Option 8 confirms the best outcomes in terms of economy and housing, which confirms the suitability of this option to address the needs of the Borough in terms of meeting housing need and sustaining the local economy. The areas where harm is identified in the table relating to Landscape, Transport and, Biodiversity are all matters that are capable of mitigation bought about through the Development Management process and should not therefore be viewed as overriding factors against pursuing Option 8.

3.8 Finally Option 8 scores poorly in relation to the ‘land’ category, which is perhaps of no real surprise given that land is a finite resource and the development of an increase level of housing necessarily results in the use of more land. This is more a function of Option 8 rather than an expression of its sustainability credentials.

3.9 The SA does not therefore identify any specific or indeed cumulative overriding issue that would render Option 8 unviable or unsustainable. Instead the SA confirms the view that Option 8 is the best in terms of addressing the significant housing shortfall in the Borough and ensuring the longevity and growth of the local economy.

3.10 In fact the final bullet point of Paragraph 6.5.26 on Page 35 confirms that Option 8 is both reasonable and would meet half of Woking’s unmet need. This is entirely in line with the approach set out by Bewley Homes in Section 2 of these representations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
With regard to one of the sites the Council now proposes to delete Bewley Homes is supportive of this amendment for the reasons set out below:

**Land to the South of West Horsley (Policy A41) – SUPPORT:** Bewley Homes supports the proposed deletion of this draft allocation from the Plan by the Council. This site is in a location known for surface water flooding as identified by the Council. As such and in accordance with the sequential approach the Council should be looking at locations where surface water flood risk is not an issue such as Bewley Homes’ promotion site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp171/2384  **Respondent:** 11458241 / Bewley Homes  **Agent:** Neame Sutton Limited (David Neame)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**Employment Led Uplift:**

2.31 The uplift suggested in the Addendum report for employment projections is also considered to be too low. This matter is being dealt with in detail by others and in this respect Bewley Homes does not wish to repeat those detailed representations here.

2.32 In short there is no sound justification for such a significant reduction in the uplift applied to the Council’s figures between the previous version of the SHMA using the 2012 population projections and the more recent 2017 addendum that uses the 2014 population projections. Guildford remains the main town in the Enterprise M3 LEP area as confirmed in both the 2016 SA and 2017 SA. It should therefore remain the case that a similar level of uplift should be applied to the 2014 population projections as was the case in the context of the 2012 based figures.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp171/2363  **Respondent:** 11458241 / Bewley Homes  **Agent:** Neame Sutton Limited (David Neame)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Introduction:

1.1 This paper sets out representations on behalf of Bewley Homes Plc (“Bewley”) in respect of Guildford Borough Council’s proposed revised submission draft Local Plan Regulation 19 consultation (“the Plan”).

1.2 For ease and consistency these representations are presented in two parts. The first part sets out Bewley Homes’ representations in relation to the Plan as drafted. The second part (see separate volume) provides detail on a proposed alternative housing site that Bewley considers should be allocated at part of the Local Plan to ensure the Council meets its housing obligations over the plan period.

1.3 The individual components of the plan are identified throughout where comments are being made. A separate consultation response proforma has been prepared for each individual representation and is submitted alongside this document.

1.4 In terms of format the remainder of this document identifies the relevant paragraph or policy reference within the proposed submission document where representations are being made and confirms whether Bewley is raising objection or support together with which soundness tests or legal compliance issues are being raised.

2.0 Spatial Planning Context and Housing Delivery

2.1 As a starting point it is considered important to set the background against which the current draft Local Plan is being prepared within Guildford Borough.

2.2 The current adopted Local Plan was adopted on 09 January 2003 and provided a planning framework for the period up to 2006. The adopted Local Plan is therefore time expired and has been so for a period of 11 years.

2.3 The Council’s progress on the preparation of a new Local Plan over this 11 year period has been woefully inadequate. As a consequence of the vacuum created by a lack of up-todate policy within the Borough the Council’s capability to maintain an adequate supply of deliverable housing land has been severely hampered.

2.4 Until recent years and, in particular the publication of its Strategic Housing Market Assessment initially in 2014, the Council has not even been in a position to confirm the state of its housing land supply shortfall.

2.5 The Council’s current stated housing land supply position set out in its Land Availability Assessment (“LAA”) Addendum April 2017 states that it has at best a 2.3 year supply with a 20% buffer. This compares with the position in 2016, which was at best a 2.4 year supply with a 20% buffer. The Council’s poor record in terms of housing delivery has therefore worsened during the course of the last monitoring year and since the initial Regulation 19 version of the Local Plan was published.

2.6 This extremely low level of supply is also only based on an assessment base date of 2013 i.e. it fails to take on board the persistent history of failure over the preceding years since the expiry of the previous Local Plan in 2006.

2.7 The reason for highlighting the matter of the Council’s extremely poor record in terms of both plan making and housing delivery is that any new Local Plan should place its emphasis not only on seeking to meet the full Objectively Assessed Needs (“OAN”) identified for the Borough but should also look to ensure that a significant proportion of that requirement is supplied in the early years of the plan period. The current approach set out the Plan does the exact opposite by including a stepped trajectory that pushes delivery back to the later years of the plan period predicated on the long lead in times from a number of strategic locations.

2.8 This approach is further reinforced by the upward trend in need that is demonstrated by the most recent population data published by the Office of National Statistics (ONS) in February 2017 in relation to migration trends. This data has identified that net long term migration remains high at a level of +273,000. Whilst this does not specifically confirm that further housing will be required in Guildford Borough it is a clear indication that the pressure for new housing across the UK and in the South East region in particular will continue to increase.

2.9 It is this kind of symptom that the Government is seeking to treat through its National policy requirement to significantly boost the supply of new housing and a focus on the presumption in favour of sustainable development.
2.10 Furthermore the Council’s position in terms of affordable housing need as confirmed in its March 2017 SHMA
Addendum increases the importance of the timely delivery of housing across the Borough. The SHMA Addendum records
a need of some 517 dpa for affordable housing, which equates to 79% of the total OAN of 654 dpa. This position has
worsened significantly from that set out in the Regulation 19 consultation version of the Plan in 2016. The 2016 version
identified 456 dpa for affordable housing, which equated to 66% of the total OAN of 693 dpa set out at that time.

2.11 With this background in mind the remainder of this section of the representations provides specific comments on the
various paragraphs and policies within the Plan.

Uplift for Student Accommodation Requirements:

2.33 Linked to the presence of the University of Surrey the Addendum report includes an uplift for specific student
accommodation. Bewley does not dispute this uplift or the need for it.

Unmet Need in the HMA – Duty to Cooperate:

2.34 The Addendum report makes no reference to unmet need in the HMA and certainly makes no adjustment to the OAN
to reflect unmet need.

2.35 Within the HMA there is a substantial unmet need equating to 3,150 dwellings arising from Woking.

2.36 This level of unmet need is acknowledged to exist by the Council in Box 6.8 (Page 27) of its Sustainability Appraisal
(“SA”).

2.37 At the recent Examination Hearings for the Waverley Borough Local Plan that concluded on 06 July 2017 the
Inspector was presented with clear and unequivocal evidence (see Statements attached at Annex 1) that Woking was unable
to deal with any of its unmet need in the current plan period and that in fact its unmet need would be likely to rise during
the course of the next plan period due to the level of environmental constraint imposed on the Borough.

2.38 Guildford also sought to advance a case that it would be unable to deal with any of Woking’s unmet need. The
Waverley Local Plan Inspector dismissed Guildford’s arguments and expressly concluded that Guildford would need to
take ‘its fair share’ of Woking’s unmet need.

2.39 The Inspector went on to conclude that Waverley Borough should take 50% of the unmet need arising from Woking
equating to a total 1,575 dwellings over its 19 year plan period i.e. an annual uplift of 83 dpa to its housing requirement.

2.40 This leaves a shortfall of 1,575 dwellings to be dealt with in the HMA. In the absence of any other LPA in the HMA
and the fact that Guildford has failed so far to even consider taking any unmet need Bewley Homes considers that as a
starting point the whole 1,575 dwellings should be provided in the Plan.

2.41 The current Plan period extends from 2013 – 2034 i.e. 21 years. The remaining unmet need from Woking of 1,575
dwellings therefore equates to an annual uplift of 75 dpa.

2.42 This is considered an entirely reasonable approach to take bearing in mind the clear Government policy set out in
Paragraph 47 of the Framework that requires LPAs to meet the entire objectively assessed needs of the HMA in their Plans.

Impact in Terms of Duty to Cooperate:

2.43 The Council’s Duty to Cooperate Topic Paper (“DTC”) notes at Paragraph 4.41 the unmet need arising from Woking
equating to a total of 3,150 dwellings. The DTC also references a Memorandum of Understanding between the three
constituent local planning authorities in the HMA (Woking, Guildford and Waverley), which states that the authorities will
continue future joint working to ensure as far as possible that the housing needs across the HMA are met.

2.44 The Memorandum of Understanding was never signed by all three authorities.

2.45 Furthermore its content does not reflect the current approach being taken by Guildford Borough in relation to the
calculation of its OAN that sets a lower figure than the previous iteration of the SHMA. Equally the Memorandum of
Understanding is apparently at odds with the express evidence presented by all three authorities to the Waverley Local Plan Examination. It is therefore considered that the weight to be attached to this document is extremely limited.

2.46 The DTC continues at Paragraph 4.50 to state that the Council does not consider it can sustainably accommodate any unmet need arising from Woking. This is indicative of the flawed approach the Council has taken because it must first calculate its OAN to meet the needs in the HMA including any unmet need arising from Woking and then test that OAN against the sustainable capacity of the Borough. Put in simply terms the Council has failed to do this.

2.47 Equally Bewley Homes considers the Council has completely failed in its legal obligation under the Duty to Cooperate because there is a clear unmet need arising from Woking that both the Council and the adjoining authority Waverley are protesting cannot be met. Yet neither authority has properly sought to test whether this unmet need (or a proportion of it) can be met. The communication between the three constituent authorities in the HMA appears to be at odds with the Memorandum of Understanding and fails to properly address the needs of the HMA. Consequently the Duty to Cooperate is not complied with in this instance.

Calculation of correct Housing Requirement:

2.48 Based on the above representations it is clear that the Council’s calculation of its housing requirement as based on the 2017 SHMA Addendum is incorrect. The correct calculation of housing requirement for the Borough against which the Plan should be prepared is summarised below:

<table>
<thead>
<tr>
<th>Description</th>
<th>dpa</th>
<th>Running Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>2014 Population projections</td>
<td>577</td>
<td>577</td>
</tr>
<tr>
<td>Uplift for Market Signals of 25%</td>
<td>144</td>
<td>721</td>
</tr>
<tr>
<td>Uplift for Employment</td>
<td>2</td>
<td>723</td>
</tr>
<tr>
<td>Uplift for Student Accommodation</td>
<td>23</td>
<td>746</td>
</tr>
<tr>
<td>Unmet Need in HMA – 50% of Woking</td>
<td>75</td>
<td>821</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td></td>
<td><strong>821</strong></td>
</tr>
</tbody>
</table>

2.49 The figure currently set out in the Plan of 654 dpa falls well short of the actual requirement for the Borough based on the clear evidence and Government policy/advice on the most appropriate way of calculating OAN together with the importance of meeting all housing need in the HMA.

2.50 Over the 21 year Plan period the above annual requirement equates to 17,241 dwellings, which is an uplift of 3,500 dwellings over the Plan period when compared with the current requirement in the Plan.

2.51 A similar level of uplift appears to have been tested through the Council’s SA under option 8, which unsurprisingly scores the best in terms housing delivery (Table 7.3 on Page 39 of the SA refers). Option 8 only scores low in relation to ecology, landscape and transport all of which are matters that can be addressed via appropriate mitigation delivered by new development and should not therefore be seen as constraints to the provision of the correct housing requirement for the Borough. Further comments on the SA are set out in Section 3 below.

2.52 Bewley notes that the draft policy refers to the housing requirement as a minimum through the use of the wording ‘at least’, which is supported and should be retained alongside any uplift to the current draft figures.

2.53 In the current national policy climate where Government policy and guidance clearly places an emphasis on significantly boosting the supply of new housing it is vital that housing requirement policies in Development Plans are identified as minima rather than maxima.

Stepped Trajectory:
2.54 The current draft wording for Policy S2 includes a stepped trajectory that seeks to push a significant proportion (some 6,800 dwellings) into the period 2025 – 2034. Furthermore the trajectory only commences in 2019 and therefore excludes the period 2013 – 2018. As a consequence the ‘Annual Housing Target’ table only shows a total provision of 9,810 dwellings, which is nowhere near the full requirement even when using the Council’s annual figure of 654 dpa. The sentence in Paragraph 4.1.9a is therefore wrong.

2.55 Aside from the clear factual inaccuracies in the wording of the table and the accompanying text the Council’s use of a stepped trajectory has the direct affect of pushing back delivery to the later years of the Plan period. This approach is at odds with clear Government policy and guidance for the following reasons:

· Reason 1 – The Council has a clear and present need for new housing delivery now as expressed in its significant 5-year housing land supply shortfall;
· Reason 2 – The Council has a persistent history of under provision as evidenced in its Annual Monitoring Reports and confirmed by its voluntary acceptance of the 20% Buffer;
· Reason 3 – The affordability ratio in the Borough is one of the highest in the Country making Guildford Borough one of the least affordable places to live;
· Reason 4 – The affordable housing need in the Borough is massive and cannot possibly be met by the current policy approach and suggested housing requirement;
· Reason 5 – The delays in the delivery of acceptable and sustainable developments have primarily been due to Member intransigence opposing otherwise appropriate development; and,
· Reason 5 – Delay to the delivery of housing in the Borough will only serve to worsen the current housing shortfall.

2.56 The Council’s argument in Paragraph 4.1.9a that the stepped trajectory is necessary because of the likely delivery rates on the strategic greenfield sites is a demonstration that its spatial delivery strategy is flawed and that as a consequence more smaller sites need to be allocated to balance the delivery trajectory. The Council has not properly assessed this approach nor has it sought to plan positively to address identified constraints to the delivery of sufficient sites such that an even trajectory can and should be delivered.

2.57 There is in Bewley Homes’ view no sound reason for taking the approach the Council has in terms of a stepped trajectory that will only serve to make an appalling record of housing delivery worse.

2.58 As confirmed by Sajid Javid in his recent LGA speech: ‘Where housing is particularly unaffordable, local leaders need to take a long, hard, honest look to see if they are planning for the right number of homes.’

2.59 In Bewley Homes’ view this Council has not yet take that long, hard, honest look to ensure that it is planning for the right number of homes and at the right time. The current Plan strategy is flawed and if progressed to Examination will fail the tests of soundness in terms of not being positively prepared, not consistent with National policy, Not justified and potentially in relation to unmet need would fail in the duty to cooperate.

Five Year Housing Land Supply:

2.60 The starting point for the current consultation in terms of 5-year housing land supply is set out in the April 2017 LAA, which identifies at best 2.3 years supply with the inclusion of a 20% buffer. The Council’s starting position is therefore one of a significant shortfall and an acknowledgement of persistent failure in terms of delivery.

2.61 When this starting point is compared with the proposed development strategy and the use of a stepped trajectory that pushes back supply to the later stages of the plan period due to the over reliance on a small number of strategic allocation sites, the Council’s 5-year housing land supply position is only set to worsen. In short the Council’s current approach is set up to fail immediately upon the adoption of the Local Plan.

2.62 The consequence of this approach is that Paragraphs 14 and 49 will continue to be engaged and the policies for the supply of housing in the newly adopted Local Plan will immediately be rendered out-of-date. Setting up a Local Plan to fail in this way is unsound and flies in the face of the plan led system advocated by Government and set out in Statute (S38(6) 2004 Act).
2.63 The Council’s housing delivery trajectory set out in the table on Page 8 of the LAA Addendum (June 2017) confirms that the only way the Council comes close to demonstrating a 5-year supply is with the use of a stepped trajectory and reliance on sites that fail to meet the Footnote 11 test, as confirmed by the fact that the Council’s 5-year supply assessment set out in the table on Page 12 of the LAA Addendum contains different (and lower) annual supply figures. When the correct OAN is applied and the stepped trajectory removed combined with the extremely low supply starting point it is clear the Plan trajectory will fail to sustain a rolling 5-year supply.

2.64 The table below summarises the clear discrepancies in the Council’s approach when either the table on Page 8 or Page 12 of the LAA Addendum is used. In both cases the Council’s position confirms it has set the Plan up to fail in terms of 5-year supply. This is at odds with the Framework and the NPPG in particular Paragraph 033 Reference ID: 3-033-20150327:

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2.65 This is a further demonstration of the fact that the Council’s development strategy must be revised to remove the stepped trajectory and seek to allocate further deliverable sites that can contribute to supply early in the plan period. A sustainable spatial strategy can be achieved in Guildford Borough that will enable a return to a plan led system of decision making, which has been sorely lacking for over a decade.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?


Comment ID: pslp171/3515  Respondent: 11458241 / Bewley Homes  Agent: Neame Sutton Limited (David Neame)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.0 Detailed Representations in Relation to Effingham

1.1 Having provided representations in relation to the Plan as drafted and the accompanying SA (see Part 1 of Bewley Homes’ representations) this section sets out Bewley Homes’ proposal for the allocation of land at Orestan Lane, Effingham as a sustainable location immediately adjacent to the settlement. The proposal is supported, where relevant, by appropriate detailed technical evidence primarily in relation to the following matters:

- Landscape and Visual Impact and Green Belt HDA
- Highways and Transportation Matters Motion

1.2 As a starting point it is important to highlight that Bewley is supportive of the Council’s identification of Effingham as a sustainable location and as a consequence the proposal to remove the settlement from the Green Belt.
1.3 This section focuses on Bewley’s objection to the Plan on the basis that further greenfield housing sites are required to deliver the housing necessary to meet the OAN and most importantly smaller sites should be allocated to enable delivery in the early years of the plan period together with ensuring flexibility.

1.4 The need for the Council to properly consider the available supply from smaller sites currently within the Green Belt is of vital importance. The level of historic under supply in the Borough is substantial and the current Plan strategy is set up to fail by not even maintaining a 5-year supply of deliverable housing sites across the Plan period. Further the Council’s strategy that is currently reliant on a small number of strategic allocations for delivery has singularly failed to address the clear and present need for housing now. The strategy consciously looks to push delivery back to the end of the Plan period whilst ignoring available, suitable and achievable sites that are situated in acknowledged sustainable locations.

1.5 The Green Belt boundary review undertaken by the Council is woefully inadequate and fails to properly consider all suitable locations, such as the promotion site, that could be delivered in the early years of the Plan period and without material harm to the objectives of the Green Belt as demonstrated by the detailed technical appraisal evidence provided by Bewley Homes.

1.6 The development strategy in the emerging Plan therefore requires fundamental review to enable the Council to address the needs of the Borough’s residents.

1.7 Furthermore and for the reasons Bewley has identified above there are fundamental flaws in the Council’s proposals to allocate 2,000 dwellings at Wisley and 1,800 dwellings at Blackwell Farm. The removal of these two allocations would place greater importance on the identification of other suitable and sustainable locations in the Borough to meet the overall housing need. Notwithstanding this point there is a need for the allocation of further sites to ensure sufficient flexibility in terms of supply of housing throughout the Plan period and to enable the Council to respond positively to changes in demand and delivery without needing to revert to a review of the Local Plan.

1.8 In specific relation to Effingham Bewley Homes’ notes that the Council had previously (at the Sites Issues and Options Consultation stage in October 2013) proposed two locations as potential housing allocations and Green Belt boundary releases at Effingham.

1.9 It would appear from a review of the Green Belt assessment prepared by Pegasus on behalf of the Council that the two proposed allocations were simply removed by the Council purely on the basis that they attracted objection rather than as a result of objective assessment.

1.10 Setting this point to one side and as set out in Sections 2 and 3 above the Council has not undertaken a full review of all suitable and available alternatives nor has its consultants explored other options for release from the Green Belt. As a consequence the Council has simply decided to change from a position whereby housing was to be allocated in Effingham to a position that it now proposes no growth to meet the needs of the community at all throughout the plan period.

1.11 The Council’s approach in this regard is without foundation and based on flawed evidence.

1.12 As demonstrated in the attached appraisals (and explored below) land at Orestan Lane represents a viable location for a relatively limited release of land from the Green Belt to provide a scale of development that is appropriate and proportionate to the size of the settlement, which the Council itself acknowledge as a sustainable location.

1.13 Much of the attached appraisal information was provided to the Council in representations submitted in 2013. This information remains relevant to these representations given that the Council has not acted on or responded to the original representations. Updates and additional information is also included to ensure the appraisals respond to the approach the Council is now pursuing in the Plan.

1.14 As identified in Part 1 of Bewley Homes’ representations the Council’s current development strategy fails to ensure delivery in the early years of the plan period to meet the needs of the Borough’s population in terms of new housing. There is a need for the release of more modest scale housing sites in sustainable locations, such as Effingham, that can deliver housing in the first 5 years of the Plan period in particular. Equally the Council’s current approach fails the residents of Effingham in terms of meeting their needs for further open market and affordable housing.
1.15 As confirmed in the Council’s own Settlement Hierarchy Study (May 2014) Effingham is regarded as a Large Village, which is the third tier in the settlement hierarchy below the Rural Service Centre of East Horsley and the Urban Area of Guildford, Ash and Tongham. Effingham is therefore a suitable and sustainable location for accommodating a modest scale of growth in the manner proposed by Bewley Homes in these representations.

1.16 Turning to consider Bewley Homes promotion site. Land at Orestan Lane, Effingham is considered to comprise a suitable location for release from the Green Belt and allocation for approximately 40 dwellings to help deliver the Council’s housing requirement for the following reasons:

**Location and Context:**

1.16.1 The proposed allocation site is situated immediately adjacent to the currently proposed boundary for the settlement of Effingham and fronts onto Orestan Lane. As set out above Effingham comprises a sustainable location for growth as identified by the Council in its settlement hierarchy. The Council’s regard for the sustainability of the settlement is also reflected by its initial proposal for allocation options in 2013 on peripheral greenfield sites as releases from the Green Belt.

1.16.2 The promotion site itself comprises three paddocks that are well contained by mature landscape planting and trees. The site is framed by existing residential development to the north (Leewood Way) and development to the south of Orestan Lane and further west along the lane.

1.16.3 In both physical and visual terms the site relates well to the settlement and appears as part of the settlement when viewed on the ground.

1.16.4 The site benefits from direct access to local services and facilities as set out in the attached Transport Accessibility Appraisal prepared by Motion. With regard to the relative accessibility of the site to services and facilities when compared with the two locations that the Council explored in 2013 it is apparent that, using the same methodology as that employed by the Council, the promotion site scores better in terms of its accessibility and is therefore more sustainability located in terms of the existing services and facilities in the village.

**Contribution to Green Belt and Landscape and Visual Impact:**

1.16.5 Having established that Effingham is considered to comprise a sustainable location for growth and that the promotion site is well related to the settlement the next key consideration is the matter of the contribution that the site makes to the Green Belt alongside more general landscape and visual impact issues.

1.16.6 It is relevant to note that the Council’s Green Belt and Countryside Study undertaken by Pegasus in January 2013 did not assess the promotion site when consideration was given to Effingham. No conclusion has therefore been drawn on behalf of the Council as to the contribution the promotion site may make to the Green Belt.

1.16.7 To address this matter Bewley has instructed its landscape architect HDA to undertake a review of the contribution the site makes to the Green Belt and also more general landscape and visual impact issues. A copy of the review is attached at Annex 3.

1.16.8 In summary the review concluded the following:

‘If the site were developed it would infill a gap in the existing settlement which has well defined boundaries. The site would not therefore result in the ‘unrestricted sprawl’ of Effingham. Development of the site would not result in the coalescence of settlements. East Horsley is separated from the site and Effingham by a large belt of woodland which physically and visually separates the two settlements and is key to the functionality of these settlements. Development within the site would have no effect on the separation of Effingham and East Horsley…..’

‘In conclusion, the site would form a discrete and appropriate location for residential development in Effingham. The site could be developed without adverse impacts on the Green Belt designation or Effingham Conservation Area. There are strong landscape features on the site which should be retained and would add character and containment to a new development, integrating the site into the existing settlement edge.’
1.16.9 It is therefore evident that in terms both of the Green Belt and landscape and visual impact matters the promotion site is acceptable and should be released for housing.

**Heritage Assets – Effingham Conservation Area:**

1.16.10 The site is located partly within the Effingham Conservation Area and therefore the impact that any residential development would have on this Heritage Asset needs to be given careful consideration.

1.16.11 This matter has been considered by Bewley Homes’ project team and in particular relation to visual and physical impacts HDA concludes that:

> 'In the context of the Effingham Conservation Area the site has no visual relationship with the historic core of the village and does not affect the setting of any local listed buildings. The site comprises a number of fields in pasture used for grazing horses and as such the impact of the site at present could be described as neutral in terms of its contribution to the character of the Conservation Area, rather than either positive or adverse. Building on the site affords opportunities for enhancement of the Conservation Area, particularly if the new housing development were of ‘modestly sized two storey dwellings set in small terraces or pairs…..together with irregularly shaped plots, visible gardens, trees, open green spaces’. Appropriate development within the site could make a positive contribution to local character and distinctiveness.'

**Transport and Highway Impacts:**

1.16.12 In relation to transport and highway impacts the technical appraisal undertaken by Motion confirms that adequate vehicular access can be achieved to the site from Orestan Lane in accordance with the requirements set out in Manual for Streets.

1.16.13 The site is well located in terms of local community facilities that can be accessed via a range of transportation modes in accordance with the requirements of the Framework and the NPPG.

1.16.14 The site is therefore sustainably located in relation to existing services and facilities within the settlement of Effingham.

**Flooding and Drainage:**

1.16.15 The whole site is within Flood Zone 1 on the Environment Agency’s indicative flood mapping and is not identified as being at risk from any known surface water flooding events. In this respect the site is sequentially preferable in flood risk terms. Furthermore the site is sequentially preferable when compared with a number of other locations such as Land at Wisley and Normandy/Flexford both of which contain land in Flood Zones 2 and 3.

1.16.16 There are no known land drainage issues on the site and in this respect a Sustainable Urban Drainage System (“SUDS”) could be employed as part of any development on the land.

**Other Technical Considerations:**

1.16.17 Other technical considerations such as ecology, archaeology, arboriculture, noise, etc are not considered to pose a constraint to the development of the site for housing such as to preclude the favourable consideration of the site as a housing allocation.

**The Approach to Allocation – Presumption in Favour of Sustainable Development:**

1.16.18 Taking into account Bewley’s representations that consider the need for the allocation of additional sites to ensure the Council can deliver housing in the early years of the plan period combined with the flaws in at least two of its large scale allocations there is a clear and present need for the inclusion of this site for housing in the Local Plan.

1.16.19 The Government emphasis in national Policy is centre on the presumption in favour of sustainable development. Paragraph 7 of the Framework identifies the three strands of sustainable development as comprising the economic, social and environmental strands. If these can be met then there is a clear presumption in favour that should lead to the natural conclusion the land should be allocated for housing.
1.16.20 **Economic** – The delivery of new housing on the promotion site will secure local employment in the short term during the construction phase, which is now a well-established and accepted benefit of residential development. Additionally any new residential development will contribute to the local economy in terms of Planning Obligations and via other means such as future Council tax revenues, new homes bonus and indirectly through increased revenue into the local economy. The economic limb is therefore met by the promotion site.

1.16.21 **Social** – As set out earlier within Bewley’s representations there is a clear and present need for new housing in the Borough now to meet the substantial shortfall in supply and to ensure that the OAN can be delivered year on year from the start of the plan period rather than from half way through it. Additionally the Council’s SHMA identifies substantial affordable housing need that cannot ever be met in the life of the new Plan based on the proposed affordable housing policy approach. Finally the Council’s proposed reliance upon strategic development, particularly at Wisley and Blackwell Farm, is likely to lead to failure in terms of delivering the overall housing requirement where the Council is reliant upon every source of supply to deliver in order to meet its OAN.

1.16.22 Therefore any proposals of more modest scale that can deliver a range of open market and affordable dwellings in a timely manner will result in social benefit in terms of helping to meet the clearly identified needs and providing the Council with a buffer of additional housing to help safeguard against non-delivery elsewhere.

1.16.23 **Environmental** – It has been demonstrated through the detailed review undertaken by HDA that the site can be released from the Green Belt without causing any unacceptable harm either in Green Belt or landscape and visual impact terms. Furthermore the site is accessible to local services and facilities, integrates well with the settlement and, will not give rise to any undue adverse impacts on the local highway network. The environmental limb is therefore met by the promotion site.

1.17 For all of the above reasons it is considered that Land at Orestan Lane, Effingham comprises a sustainable location for the allocation of approximately 40 dwellings that will assist the Council in ensuring its housing delivery obligations are met and that most importantly delivery of the right level of housing takes place early in the plan period.

1.18 Bewley therefore considers that for the Plan to be found sound further land allocations are required and Land at Orestan Lane, Effingham comprises a sustainable option that is available for immediate delivery. The site should be allocated for housing, included within the settlement and removed from the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

1.2 As a starting point it is important to highlight that Bewley is supportive of the Council’s identification of Wood Street Village as a sustainable location and as a consequence the proposal to remove the settlement from the Green Belt.

1.3 This section focuses on Bewley’s objection to the Plan on the basis that further greenfield housing sites are required to deliver the housing necessary to meet the OAN and most importantly smaller sites should be allocated to enable delivery in the early years of the plan period together with ensuring flexibility.

1.4 The need for the Council to properly consider the available supply from smaller sites currently within the Green Belt is of vital importance. The level of historic under supply in the Borough is substantial and the current Plan strategy is set up to fail by not even maintaining a 5-year supply of deliverable housing sites across the Plan period. Further the Council’s strategy that is currently reliant on a small number of strategic allocations for delivery has singularly failed to address the clear and present need for housing now. The strategy consciously looks to push delivery back to the end of the Plan period whilst ignoring available, suitable and achievable sites that are situated in acknowledged sustainable locations.

1.5 The Green Belt boundary review undertaken by the Council is woefully inadequate and fails to properly consider all suitable locations, such as the promotion site, that could be delivered in the early years of the Plan period and without material harm to the objectives of the Green Belt as demonstrated by the detailed technical appraisal evidence provided by Bewley Homes. The Council has missed the opportunity presented by Bewley Homes’ promotion site in this instance given that it comprises previously-developed land partly within the settlement. In accordance with the Council’s spatial strategy the release of land such as this promotion site is a priority for the Council, which has been completely overlooked in this instance.

1.6 The development strategy in the emerging Plan therefore requires fundamental review to enable the Council to address the needs of the Borough’s residents.

1.7 Furthermore and for the reasons Bewley has identified above there are fundamental flaws in the Council’s proposals to allocate 2,000 dwellings at Wisley and 1,800 dwellings at Blackwell Farm. The removal of these two allocations would place greater importance on the identification of other suitable and sustainable locations in the Borough to meet the overall housing need. Notwithstanding this point there is a need for the allocation of further sites to ensure sufficient flexibility in terms of supply of housing throughout the Plan period and to enable the Council to respond positively to changes in demand and delivery without needing to revert to a review of the Local Plan.

1.8 As set out in Part 1 of Bewley Homes’ representations the Council has not undertaken a full review of all suitable and available alternatives nor has its consultants explored other options for release from the Green Belt. As a consequence the Council has simply decided not to make any provision for growth to meet the needs of the community at all throughout the plan period within Wood Street Village.

1.9 The Council’s approach in this regard is without foundation and based on flawed evidence.

1.10 As demonstrated in the attached appraisals (and explored below) land at Hester’s Yard represents a viable location for a relatively limited release of land from the Green Belt on a previously-developed site to provide a scale of development that is appropriate and proportionate to the size of the settlement, which the Council itself acknowledge as a sustainable location.

1.11 As identified in Part 1 of Bewley Homes representations the Council’s current development strategy fails to ensure delivery in the early years of the plan period to meet the needs of the Borough’s population in terms of new housing. There is a need for the release of more modest scale housing sites in sustainable locations, such as Wood Street Village, that can deliver housing in the first 5 years of the Plan period in particular. Equally the Council’s current approach fails the residents of Wood Street Village in terms of meeting their needs for further open market and affordable housing.

1.12 As confirmed in the Council’s own Settlement Hierarchy Study (May 2014) Wood Street Village is regarded as a Large Village, which is the third tier in the settlement hierarchy below the Rural Service Centre of East Horsley and the Urban Area of Guildford, Ash and Tongham. Wood Street Village is therefore a suitable and sustainable location for accommodating a modest scale of growth in the manner proposed by Bewley Homes in these representations.
1.13 Turning to consider Bewley Homes promotion site. Land at Hester’s Yard, Wood Street Village is considered to comprise a suitable location for release from the Green Belt and allocation for approximately 40 dwellings to help deliver the Council’s housing requirement for the following reasons:

**Location and Context:**

1.13.1 The proposed allocation site is situated immediately adjacent to the currently proposed boundary for the settlement of Wood Street Village and the front section of the site is actually within the settlement and benefits from a direct road frontage onto Oak Hill. As set out above Wood Street Village comprises a sustainable location for growth as identified by the Council in its settlement hierarchy. The Council’s regard for the sustainability of the settlement is reflected in its desire to roll back the Green Belt boundaries in the Plan.

1.13.2 The promotion site itself comprises a variety of commercial uses including open storage, vehicle repairs and servicing. The site is predominantly previously developed land in accordance with the definition set out in Annex 2 of the Framework.

1.13.3 Given the emphasis that the Council is placing upon the release of previously developed land to meet its housing requirement this promotion site is considered to comprise just the kind of location that should be allocated in accordance with Paragraph 4.1.6 of the Plan that states:

*‘Our preference is to focus growth in the most sustainable locations, making best use of previously developed land (including in the Green Belt if appropriate).’* (Bold is our emphasis)

1.13.4 In both physical and visual terms the site relates well to the settlement and appears as part of the settlement when viewed on the ground.

1.13.5 The site benefits from direct access to local services and facilities as set out in the attached Transport Accessibility Appraisal prepared by Motion.

**Contribution to Green Belt and Landscape and Visual Impact:**

1.13.6 Having established that Wood Street Village is considered to comprise a sustainable location for growth and that the promotion site is well related to the settlement the next key consideration is the matter of the contribution that the site makes to the Green Belt alongside more general landscape and visual impact issues.

1.13.7 It is relevant to note that the Council’s Green Belt and Countryside Study undertaken by Pegasus in January 2013 did not assess the promotion site when consideration was given to Wood Street Village. No conclusion has therefore been drawn on behalf of the Council as to the contribution the promotion site may make to the Green Belt.

1.13.8 To address this matter Bewley has instructed its landscape architect EDP to undertake a review of the contribution the site makes to the Green Belt and also more general landscape and visual impact issues. A copy of the review is attached at Annex 2.

1.13.9 In summary the review concluded the following:

*‘This review provides a clear indication that the site is entirely suitable for extraction from the Green Belt, without resulting in any adverse effects on the Green Belt function as identified within the NPPF, or on the local landscape character or the amenity of local visual receptors. This results primarily from the clearly demarcated boundary features, existing commercial uses within the site, the enclosed nature of the site and the consequential limitation in landscape and visual effects, but also the way in which the site is severed from the key area providing openness between Wood Street Village and Fairlands.

A development which seeks to address the constraints of the site, would contribute to retaining the openness of the Green Belt by providing much needed housing on a site where Green Belt function would not be comprised, whilst also providing a sustainable and high quality development which links very well to the existing village.’*
1.13.10 It is therefore evident that in terms both of the Green Belt and landscape and visual impact matters the promotion site is acceptable and should be released for housing.

**Transport and Highway Impacts:**

1.13.11 In relation to transport and highway impacts the technical appraisal undertaken by Motion confirms that adequate vehicular access can be achieved to the site from Oak Hill in accordance with the requirements set out in Manual for Streets.

1.13.12 The site is well located in terms of local community facilities that can be accessed via a range of transportation modes in accordance with the requirements of the Framework and the NPPG.

1.13.13 The site is therefore sustainably located in relation to existing services and facilities within the settlement of Wood Street Village.

**Flooding and Drainage:**

1.13.14 The whole site is within Flood Zone 1 on the Environment Agency’s indicative flood mapping and is not identified as being at risk from any known surface water flooding events. In this respect the site is sequentially preferable in flood risk terms. Furthermore the site is sequentially preferable when compared with a number of other locations such as Land at Wisley and Normandy/Flexford both of which contain land in Flood Zones 2 and 3.

1.13.15 There are no known land drainage issues on the site and in this respect a Sustainable Urban Drainage System ("SUDS") could be employed as part of any development on the land.

**Other Technical Considerations:**

1.13.16 Other technical considerations such as ecology, archaeology, arboriculture, noise, etc are not considered to pose a constraint to the development of the site for housing such as to preclude the favourable consideration of the site as a housing allocation.

**The Approach to Allocation – Presumption in Favour of Sustainable Development:**

1.13.17 Taking into account Bewley’s representations that consider the need for the allocation of additional sites to ensure the Council can deliver housing in the early years of the plan period combined with the flaws in at least two of its large scale allocations there is a clear and present need for the inclusion of this site for housing in the Local Plan.

1.13.18 The Government emphasis in national Policy is centre on the presumption in favour of sustainable development. Paragraph 7 of the Framework identifies the three strands of sustainable development as comprising the economic, social and environmental strands. If these can be met then there is a clear presumption in favour that should lead to the natural conclusion the land should be allocated for housing.

1.13.19 **Economic** – The delivery of new housing on the promotion site will secure local employment in the short term during the construction phase, which is now a well established and accepted benefit of residential development. Additionally any new residential development will contribute to the local economy in terms of Planning Obligations and via other means such as future Council tax revenues, new homes bonus and indirectly through increased revenue into the local economy. The economic limb is therefore met by the promotion site.

1.13.20 **Social** – As set out earlier within Bewley’s representations there is a clear and present need for new housing in the Borough now to meet the substantial shortfall in supply and to ensure that the OAN can be delivered year on year from the start of the plan period rather than from half way through it. Additionally the Council’s SHMA identifies substantial affordable housing need that cannot ever be met in the life of the new Plan based on the proposed affordable housing policy approach. Finally the Council’s proposed reliance upon strategic development, particularly at Wisley and Blackwell Farm, is likely to lead to failure in terms of delivering the overall housing requirement where the Council is reliant upon every source of supply to deliver in order to meet its OAN.
1.13.21 Therefore any proposals of more modest scale that can deliver a range of open market and affordable dwellings in a timely manner will result in social benefit in terms of helping to meet the clearly identified needs and providing the Council with a buffer of additional housing to help safeguard against non-delivery elsewhere.

1.13.22 **Environmental** – It has been demonstrated through the detailed review undertaken by EDP that the site can be released from the Green Belt without causing any unacceptable harm either in Green Belt or landscape and visual impact terms. Furthermore the site is accessible to local services and facilities, integrates well with the settlement and, will not give rise to any undue adverse impacts on the local highway network. The environmental limb is therefore met by the promotion site.

1.14 For all of the above reasons it is considered that Land at Hester’s Yard, Wood Street Village comprises a sustainable location for the allocation of approximately 40 dwellings that will assist the Council in ensuring its housing delivery obligations are met and that most importantly delivery of the right level of housing takes place early in the plan period.

1.15 Bewley therefore considers that for the Plan to be found sound further land allocations are required and Land at Hester’s Yard, Wood Street Village comprises a sustainable option that is available for immediate delivery. The site should be allocated for housing, included within the settlement boundary and removed from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

strategy that is currently reliant on a small number of strategic allocations for delivery has singularly failed to address the clear and present need for housing now. The strategy consciously looks to push delivery back to the end of the Plan period whilst ignoring available, suitable and achievable sites that are situated in acknowledged sustainable locations.

1.5 The Green Belt boundary review undertaken by the Council is woefully inadequate and fails to properly consider all suitable locations, such as the promotion site, that could be delivered in the early years of the Plan period and without material harm to the objectives of the Green Belt as demonstrated by the detailed technical appraisal evidence provided by Bewley Homes.

1.6 The development strategy in the emerging Plan therefore requires fundamental review to enable the Council to address the needs of the Borough’s residents.

1.7 Furthermore and for the reasons Bewley has identified above there are fundamental flaws in the Council’s proposals to allocate 2,000 dwellings at Wisley and 1,800 dwellings at Blackwell Farm. The removal of these two allocations would place greater importance on the identification of other suitable and sustainable locations in the Borough to meet the overall housing need. Notwithstanding this point there is a need for the allocation of further sites to ensure sufficient flexibility in terms of supply of housing throughout the Plan period and to enable the Council to respond positively to changes in demand and delivery without needing to revert to a review of the Local Plan.

1.8 Horsley is a sustainable location for accommodating further growth and the Council has not properly assessed its capacity nor has it considered the detailed technical appraisal information presented by Bewley Homes in its representations to the first Regulation 19 consultation in 2016. This failure on the part of the Council has resulted in the Plan missing the opportunity to allocate further land in a sustainable manner to help meet the needs of the Borough’s residents.

1.11 Turning to consider Bewley Homes promotion site. Land at Foxbury is considered to comprise a suitable location for release from the Green Belt and allocation for approximately 50 dwellings to help deliver the Council’s housing requirement for the following reasons:

**Location and Context:**

1.11.1 The proposed allocation site is situated immediately adjacent to the currently proposed boundary for the settlement of West Horsley and fronts onto the A246 (Epsom Road). West Horsley comprises a sustainable location for growth as identified by the Council in its settlement hierarchy. The Council’s regard for the sustainability of the settlement is also reflected its proposed allocation of some 485 dwellings on other sites including peripheral greenfield locations.

1.11.2 The promotion site itself is framed by Cranmore School and its grounds to the west, Squires Garden Centre to the east, an area of woodland (within Bewley’s control) to the north and the A246 to the south.

1.11.3 In both physical and visual terms the site relates well to the settlement and appears as part of the settlement when viewed on the ground.

1.11.4 The site benefits from direct access to local services and facilities as illustrated on the attached plan (see Transport Accessibility Appraisal prepared by Motion – Annex 3) and in particular the following key facilities:

- Cranmore School
- Newsagent
- Dentist
- Post Office
- Village Hall
- Bus Stops

**Contribution to Green Belt and Landscape and Visual Impact:**

1.11.5 Having established that West Horsley is considered to comprise a sustainable location for growth and that the promotion site is well related to the settlement the next key consideration is the matter of the contribution that the site makes to the Green Belt alongside more general landscape and visual impact issues.
1.11.6 It is relevant to note that the Council’s Green Belt and Countryside Study undertaken by Pegasus in January 2013 did not assess the promotion site when consideration was given to West Horsley. No conclusion has therefore been drawn on behalf of the Council as to the contribution the promotion site may make to the Green Belt.

1.11.7 To address this matter Bewley has instructed its landscape architect EDP to undertake a review of the contribution the site makes to the Green Belt and also more general landscape and visual impact issues. A copy of the review is attached at Annex 2.

1.11.8 In summary the review concluded the following:

‘…..the findings of the review undertaken clearly demonstrate that the site could be released from Green Belt without adversely affecting the wider functions in the context of the area of open land between East and West Horsley. The consideration goes further to consider the sustainability issues of the site, and whether the boundaries of the site could provide a long term, defensible, development area, which serves to contribute to Green Belt functions.

In these respects the site is again found to be viable, both with reference to the other Potential Development Areas (PDAs) around the village (as identified within the Council’s Green Belt review of 2015) and also in its own right. The site is essentially a parcel of land contained on all sides by existing strong boundary features (mostly of an urban character), and serves no function in terms of maintaining the open area between East and West Horsley.

In terms of potential landscape and visual effects, the limitation in views available of a proposed development in this location confirms that development on the site would have little, or no, effects upon either sensitive or non-sensitive receptors, with any change limited to those receptors passing along the A246, a small number of adjacent residential dwellings and glimpse views from a nearby bridleway.

In landscape terms the site is not within the AONB or AGLV, and will not be openly visible from either area; indeed it is likely that there will be no views from the AONB, except perhaps distant views from a small number of residences along Shere Road, where views would be in the context of the existing settlement. There will be a change from an open pasture field to one of built development, but even the Council’s own Green Belt study identifies (erroneously) this site as medium density development, indicating the heavily influenced character of the site.’

1.11.9 It is therefore evident that in terms both of the Green Belt and landscape and visual impact matters the promotion site is acceptable and should be released for housing.

Transport and Highway Impacts:

1.11.10 In relation to transport and highway impacts the technical appraisal undertaken by Motion confirms that adequate vehicular access can be achieved to the site from Epsom Road in accordance with the requirements set out in Manual for Streets.

1.11.11 The site is well located in terms of local community facilities that can be accessed via a range of transportation modes in accordance with the requirements of the Framework and the NPPG.

1.11.12 The site is therefore sustainably located in relation to existing services and facilities within the settlement of West Horsley.

Flooding and Drainage:

1.11.13 The whole site is within Flood Zone 1 on the Environment Agency’s indicative flood mapping and is not identified as being at risk from any known surface water flooding events. In this respect the site is sequentially preferable in flood risk terms. Furthermore the site is sequentially preferable when compared with a number of other locations such as Land at Wisley and Normandy/Flexford both of which contain land in Flood Zones 2 and 3.

1.11.14 There are no known land drainage issues on the site and in this respect a Sustainable Urban Drainage System (“SUDS”) could be employed as part of any development on the land.

Other Technical Considerations:
1.11.15 Other technical considerations such as ecology, archaeology, arboriculture, noise, etc are not considered to pose a constraint to the development of the site for housing such as to preclude the favourable consideration of the site as a housing allocation.

The Approach to Allocation – Presumption in Favour of Sustainable Development:

1.11.16 Taking into account Bewley’s representations that consider the need for the allocation of additional sites to ensure the Council can deliver housing in the early years of the plan period combined with the flaws in at least two of its large scale allocations there is a clear and present need for the inclusion of this site for housing in the Local Plan.

1.11.17 The Government emphasis in national Policy is centre on the presumption in favour of sustainable development. Paragraph 7 of the Framework identifies the three strands of sustainable development as comprising the economic, social and environmental strands. If these can be met then there is a clear presumption in favour that should lead to the natural conclusion the land should be allocated for housing.

1.11.18 **Economic** – The delivery of new housing on the promotion site will secure local employment in the short term during the construction phase, which is now a well-established and accepted benefit of residential development. Additionally any new residential development will contribute to the local economy in terms of Planning Obligations and via other means such as future Council tax revenues, new homes bonus and indirectly through increased revenue into the local economy. The economic limb is therefore met by the promotion site.

1.11.19 **Social** – As set out earlier within Bewley’s representations there is a clear and present need for new housing in the Borough now to meet the substantial shortfall in supply and to ensure that the OAN can be delivered year on year from the start of the plan period rather than from half way through it. Additionally the Council’s SHMA identifies substantial affordable housing need that cannot ever be met in the life of the new Plan based on the proposed affordable housing policy approach. Finally the Council’s proposed reliance upon strategic development, particularly at Wisley and Blackwell Farm, is likely to lead to failure in terms of delivering the overall housing requirement where the Council is reliant upon every source of supply to deliver in order to meet its OAN.

1.11.20 Therefore any proposals of more modest scale that can deliver a range of open market and affordable dwellings in a timely manner will result in social benefit in terms of helping to meet the clearly identified needs and providing the Council with a buffer of additional housing to help safeguard against non-delivery elsewhere.

1.11.21 **Environmental** – It has been demonstrated through the detailed review undertaken by EDP that the site can be released from the Green Belt without causing any unacceptable harm either in Green Belt or landscape and visual impact terms. Furthermore the site is accessible to local services and facilities, integrates well with the settlement and, will not give rise to any undue adverse impacts on the local highway network. The environmental limb is therefore met by the promotion site.

1.12 For all of the above reasons it is considered that Land at Foxbury, West Horsley comprises a sustainable location for the allocation of approximately 50 dwellings that will assist the Council in ensuring its housing delivery obligations are met and that most importantly delivery of the right level of housing takes place early in the plan period.

1.13 Bewley therefore considers that for the Plan to be found sound further land allocations are required and Land at Foxbury comprises a sustainable option that is available for immediate delivery. The site should be allocated for housing, removed from the Green Belt and included within the settlement boundary for West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

4.0 Changes Sought to Plan and Conclusions

4.1 In order for the Plan to be sound the following key changes are required:

1. Revision to the SHMA and the Plan to correct the OAN to 821 dpa reflecting the calculation set out in Section 2 of these representations;

2. Allocation of further smaller sites to address shortfall in provision in the early and middle years of the Plan period arising from the over reliance on a small number of strategic allocations;

3. Removal of stepped trajectory and replacement with a uniform trajectory across the Plan period;

4. Increase in Ash and Tongham allocation to properly reflect its capacity and status as a sustainable location outside of the Green Belt;

5. Removal of proposal for Bridge over the railway at Ash and Tongham;

6. Amendments to other draft allocations as recommendation in Section 2 of these representations; and,

7. Update to SA to properly consider all of the above matters.

4.2 Without the above changes to the Plan the Council has not only created a document that is unsound but also fails in the duty to cooperate and the legal obligations in relation to the SA. The Plan in its current form cannot proceed to Examination.

[Annex 1 Copy of Woking Borough Council’s Matters Statement to Waverley Borough Local Plan EiP – June 2017]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Bewley Homes' representations in relation to the Plan as a whole and specific paragraphs, policies and proposals are set out in the attached representations documents that clearly identify those sections of the Plan that Bewley Homes consider to either fail to be legally compliant, are unsound, or fail the duty to cooperate. In relation to the tests of soundness these are identified in bold against each section of the Plan that Bewley Homes is making representations against.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/1713</th>
<th>Respondent: 11547041 / Jen Wright</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Jacobs Well</td>
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Jacobs Well greenbelt - I object to Jacobs Well and Blanchards Hill being removed from the greenbelt with the resulting presumption in favour of building houses. Firstly, the rural character of the area will be ruined by the removal of the surrounding fields and green areas.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPP16/7301</th>
<th>Respondent: 11547041 / Jen Wright</th>
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I also object to infilling and adding houses to the Jacobs Well village when there is no other infrastructure to support this. It is already the case that living on Blanchards Hill we cannot be certain of which primary or secondary school our child would be able to attend and this uncertainty would only increase if further houses were to be built. In general if more houses are to be built across the borough then schools designed for the villages (inset or not) need to be built or existing nearby schools expanded. For example, our nearest primary school is Burpham at 0.9 miles but we are highly unlikely to receive a place and children from Jacobs Well village are forced to go to schools all over Guildford which is unacceptable and difficult for working parents. For secondary school the rules are even more ludicrous as the existence of a relatively small Church of England school, Christs College, as our nearest school, which takes 50% of christian faith and then children from several feeder schools first means that our child cannot reasonably be likely to be offered a place at this school in most if not all years. However the "nearest school" criteria used by most other schools (for example our second nearest, George Abbott) then means that we would not get into another nearby school either. Therefore until the schools situation for villages like Jacobs Well is fixed or the local schools are forced to change their admittance criteria so as to
cater for people in such villages without them being left to have a place in whichever dire school still has places left each year, then I do not think that further houses should be built in such areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7300  Respondent: 11547041 / Jen Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Secondly, the area is not well equipped infrastructure wise to deal with the increased traffic and people that increased housing would lead to. Clay Lane, Jacobs Well Road and Blanchards Hill are already extremely busy roads. Blanchards Hill has no footpath and is 40mph making it dangerous for there to be further traffic and pedestrians. Although if it is removed from the green belt then I would expect the road safety to be investigated and a 30mph limit put in place along the road as per most residential non green belt roads

Clay Lane link road

I object to the building of the clay lane link road from Slyfield to Clay Lane. I have previously provided detailed reasons why I object to this but briefly, Clay lane, Blanchards Hill and other local roads are already very busy and dangerous, particularly at rush hour. Blanchards Hill is a rural road with no footpath and would be particularly more dangerous if traffic was to increase. A lot of the houses along all roads are very close to the road and therefore resulting increase in heavy traffic would be detrimental to the buildings as well as causing disruption to the inhabitants. It would also ruin the nature of the area by making it a busy thoroughfare rather than a village where people live.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2776  Respondent: 11550561 / Karen Lord  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I have been a resident in Send since 1986, joining my husband who has been a Send resident all his life. The village has seen development but nothing on the scale that has been proposed in this 2016 Local Plan. It really has alarmed my family and all our community, at the proposed developments around our home.

I strongly object to Send village being removed from the Green Belt. This is something that has always strengthened our community and enjoyment of our village, having the countryside around and giving us a natural green break between local towns. We are so close to being absorbed into the urban landscape. I strongly object with any erosion of the Green Belt as its design was to be permanent. I voted for the Conservative party at the last election and one of the main reasons was because of the promise to protect the Green Belt. I do hope the Conservative party/GBC do not break this promise.

I strongly object to the Garlick’s Arch site as we as a village were not properly consulted. I attended the last Local Parish Council meeting before the Local Plan was launched and felt the Burnt Common site put forward on the Draft was quite enough to be challenged. I attended this meeting to keep informed and act as a responsible and pro-active member of the Send community. It was very underhanded that the Local Plan Draft was changed at extremely short notice at the GBC special executive meeting, where the Burnt Common site was removed and a supplementary information sheet added to replace it with Garlick’s Arch, a development of over double the housing at 400, as well as 7000sq metres of industrial units!

I object to the Garlick’s Arch site with the change of this land, as it is ancient woodland, of local beauty and also floods, which I have seen. I object to the 400 houses and the 600+ cars that these will add to the local infrastructure. The local roads are already heavily congested at commuting times let alone with so much more added, and also the pressure on local facilities. This local woodland offers an environmental buffer between the A3 and Portsmouth Road, helping absorb the heavy traffic emissions. Without this, the pollution and rainfall will become even higher issues.

I object to the 7000sq metres of industrial units at the Garlick’s Arch site. Is there not space yet at Slyfield or Brownfield sites that are more appropriate for industrial units rather than virgin Green Belt land? Also I believe from the last Employment Land needs Assessment of 2015 that this showed a reduction of 80% in required employment from the previous Local Draft Plan.

I strongly object to a new interchange with the A3 at Burnt Common. Send will be a cut through and have to take the extra traffic from Woking and Guildford and also the A3 and M25 for the proposed developments at Blackwell Farm, Gosden Hill, Wisley Airfield, and Burpham. Our main road, the A247 is already struggling, with regular crawling traffic/gridlock. The pollution and noise levels are already very high.

I strongly object to the development of 40 houses and 2 travellers pitches at Send Hill because some the road is single access and some parts winding and extremely narrow, to add even more traffic to an already struggling road would be dangerous. I have witnessed at least three traffic road accidents on the Send Hill/Potters Lane junction. I have been gridlocked many, many times with traffic unable to pass along Send Hill and then blocking Potters Lane. I have seen horses go out of control because of the narrow and high banks of the Send Hill road (towards Potters Lane). It cannot be walked safely as a pedestrian (on local school trips, out with the Guides, walking to the church someone has to walk ahead to block the traffic coming up to allow the children to walk safely. Also I believe, the land is an unsafe landfill site. It’s a beautiful area of countryside that I walk and enjoy on a regular basis. Also this affects our local cemetery that is a place of beauty and peace; this will be compromised.

I strongly object to the Clockbarn Nursery site with 45 houses because again of the very inadequate access and traffic volume. Tannery Lane is like many of our Send back roads, very narrow and twisting. It is already very hazardous for traffic from Tannery Lane to join the Send Road (which I had unpleasant experience of when working at Tannery House). Traffic has to dangerously edge out, as there are always parked cars by junction, and often gridlocks Send Road. We already have the marina development going ahead and 60+ apartments, and I feel that this in it's own right will cause enough traffic concerns. Also at this junction is our Send Recreation Ground, which has been highly maintained and extremely popular. I object to any more pressure being put on this road junction as it will be a detriment to our Park, with safety, noise and pollution.

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Appendix d I have also read and heard about the GBC's refusal to disclose their housing requirement calculations and that these have been greatly exaggerated. I object to having local plans being suggested without the GBC written evidence to back up
the housing requirement. I object to the fact that infrastructure requirements have not been properly thought through, as Send's are not good enough to deal with the proposed housing levels. There will be irrevocable pressure and damage on the surrounding flora/fauna and infrastructure; roads, doctors, schools will not be able to handle this.

Send I do appreciate that housing in the Guildford borough is needed but would ask that GBC put every effort looking into Brownfield sites in the urban area before the open countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Clockbarn Nursery, Tannery Lane, Send, Policy A.42, Now 60 homes in place of 45 homes previously, I object to the Policy A42 change at Clockbarn in Tannery Lane because the increase to 60 homes in place of 45 homes is too much- a third more. It ignores all the hundreds of previous objections made by local people. It will put pressure on the local infrastructure and worsen access and traffic problems in Tannery Lane and Send Road. It will add to the surface water flooding that we already have a problem with. It will further alter the village becoming more urban losing more Green Belt which was to protect natural or semi natural environments and to protect unique character of rural communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Land at Garlicks Arch, Send Marsh Policy A.43, Now 400 homes and 6 Travelling Showpeople plots, I object to Policy A.43 because It will cause over-development of our village and the number of homes is excessive. It will join up Ripley and Send and defeat the key purpose of Green Belt which is to protect natural or semi natural environments, protect unique character of rural communities that might be absorbed by expanding suburbs. It is beautiful permanent Green Belt and no “exceptional circumstances” exist, with beautiful bluebell woods, this ancient woodland that existed at the time of Queen Elizabeth I. It is subject to frequent flooding. I object because I do not believe there is a proven demand for Travelling Showpeople plots in this location. It ignores all the thousands of previous objections made by local people. I especially
object because of the pressure on the local infrastructure, on our village services and the excessive traffic that will gridlock the already busy roads of Ripley and Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Land at Burnt Common, London Road, Policy A.58, Now a new allocation for a minimum of 7,000 sq m of industrial or warehousing, I object to the word “minimum” now being shown which has changed from the previous “maximum” in the 2016 Plan because since that time there has been a decline in demand for industrial land. But I especially object as this was deleted from the 2014 draft because of all the objections made previously.</td>
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<td>I object to Policy A.58 because it will mean we will join/absorb into villages against the reasoning of the Green Belt which is to protect natural or semi natural environments, protect unique character of rural communities that might be absorbed by expanding suburbs. I object to the impact it will have on the surrounding main roads and back smaller roads that already suffer traffic congestion.</td>
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<td>I object to the need to build industrial or warehouse development in the middle of the Green Belt because Slyfield and Guildford still have empty sites and industrial units. The '2017 Employment Land Need Assessment' showed a reduction in demand to 3.9 hectares for industrial land for the whole borough, not a huge over allocation of 10 hectares at Send in the Green Belt.</td>
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Greenbelt, At Paragraph 4.3.15, Policy.2, Send Business Park now **taken out of the Green Belt altogether,** I object from this removal from Green Belt because development of this beautiful area is inappropriate as it protects our unique character around the Wey Navigation and the rural part of our community that will be otherwise be absorbed into the surrounding towns/villages. It offers cleaner air, contiguous habitat network for wild plants, and wildlife. All the reason why it was inserted into Green Belt initially. I object because the road access is very bad into and out of Tannery Lane onto the already very busy and congested Send Road.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/732  **Respondent:** 11556161 / Barry Lewis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Development within West Horsley. I think West Horsley should yield a parcel of Green Belt land for appropriate development. 40-homes to the rear of the Lotus dealership would seem an ideal site (A37) and/or one of the infill sites A39 or A40.

Sites A39 and A41 do not appear to be "infill" sites so I would not support any plans in the next 10-years to build on these Green Belt sites.

In summary

GBC should make full use of land within the urban settlements and Council land before allowing development within the Green Belt.

The construction of purpose built whole communities within the Green Belt, such as Wisley (and Dunsfold) should be supported within their respective site boundaries and subsequent "development creep" avoided.

Whole scale areas within villages should not be removed from the Green Belt but communities should be encouraged to yield current Green Belt sites for development and I believe one or two of three sites in West Horsley should be made available. Less than 200 additional properties and the impact should be absorbed by the community, any more than 200 houses will have a detrimental impact on the community and services.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/1187  **Respondent:** 11556161 / Barry Lewis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Wisley, I would support the proposed development at Wisley Airfield, this seems to be the creation of a sustainable and self-contained community which could have good road links on what is arguably a "brown-field site". I support the Wisley proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Can you tell me why GBC have ring-fenced Council owned residential properties from further development? I have identified a number of Council houses with large gardens, not in the Green Belt which are suitable for additional development. The Housing Department however, flatly refuse to discuss such development proposals. surely an untenable situation?

The Council do however seem "hell-bent" on development within the Green Belt.

The basic principal of no development within the Green Belt should be upheld. Communities however need to grow so I can support limited and sustained development within the Green Belt on specific infill sites. I cannot support whole scale removal of land from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 11659905 / Thakeham Homes (Anthony Heslehurst)</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ash and Tongham</td>
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Land north of Grange Road, Ash

Thakeham Homes wishes to recommend the site for residential development and as such supports the inclusion of the site within the housing site allocation ‘A29 Land to the south and east of Ash and Tongham’ in the Pre Submission Local Plan. The red line location plan for the site has been appended to this representation at Appendix 1.

Figure 1. Extract from Pre Submission Local Plan, showing the site within strategic allocation A29.

Availability

The NPPG provides the following guidance in regard to considering whether a site is available for development:

“A site is considered available for development, when, on the best information available, there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips tenancies or operation requirements of landowners. This will often mean that land is controlled by a developer or landowner who has expressed an intention to develop”

NPPG Paragraph 021 Ref. 3-020-20140306

As highlighted within this representation, the site is controlled by Thakeham Homes Ltd and we will be actively engaging with the council over the coming months prior to submission of a full planning application for residential development. Thakeham is current progressing a reserved matters application for the adjacent site to the north for the delivery of 26 dwellings (Planning application ref 16/P/00663) following the grant of outline consent in December 2013.

Thakeham has a proven track record for delivering a number of high quality residential schemes across Surrey, Sussex and Hampshire and will be seeking to deliver circa 20 dwellings on the site with a view to commencing development on site at the earliest opportunity.

Suitability

The NPPG provides the following guidance when considering whether a site is suitable for development:

“Sites in existing development plans or with planning permission will generally be considered suitable for development although it may be necessary to assess whether circumstances have changed which would alter their suitability”

NPPG Paragraph 019 Ref. 019-20140306

The site is located on the eastern edge of Ash village and is within walking distance of the various local amenities of Ash High Street. The Ash and Tongham Urban Area falls on the top tier of the settlement hierarchy and is therefore considered to have a range of services and facilities to meet the needs of the existing community as well as providing key services for surrounding smaller villages. The site has good transport links, with a railway station within walking distance of the site, and there is good access to bus links from Grange Road on the south western corner of the site.

The site has been submitted to and included within the Land Availability Assessment and promoted to the Local Plan, which acknowledges its suitability for residential development.

It is therefore evident from the proposed allocation and the supporting evidence including the LAA, that the site is considered suitable for development within the meaning of the NPPG.

Achievability

In determining whether a site is achievable for development, the NPPF provides the following guidance:

“A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of the site and the capacity of the developer to complete and let or sell the development over a certain period”

NPPG, Paragraph 021 Ref. 021-20140306
Given the acute housing need within the Borough and the proposed inclusion of the site within a strategic allocation in the Pre Submission Local Plan, it is considered that there is a reasonable prospect of residential development being achieved on site by 2021.

As stated above, Thakeham has a proven track record for delivering schemes of a similar size and scale throughout Surrey, Sussex and Hampshire, and has the capacity to deliver the development of the site to provide much needed new homes within the first 5 years of the plan period.

**Deliverability**

For the reasons above, the site is considered to be available, suitable and achievable, and therefore deliverable in accordance with the NPPG. As such, we consider that the site could provide much needed housing development within the plan period and support the proposed strategic allocation A29 Land to the south and east of Ash and Tongham.

**Conclusions**

In conclusion, we consider that an increase in housing land supply is required if the plan is to be consistent with national policy and therefore ‘sound’ with respect to the NPPF.

With regard to the expected shortfall of circa 2,000 dwellings by 2017/18, it is our view that at least a further 400 dwellings per annum are required in the first 5 years of the plan period, to enable the Council to meet its OAN prior to larger strategic sites coming forward in accordance with the housing trajectory in the LAA. In addition, we consider that the plan should account for market signals and the duty to cooperate, to ensure a robust and realistic housing land supply.

Given the issues discussed within this representation, it is our view that the council should work proactively to identify and include additional housing site allocations in sustainable locations in the towns and villages and areas of least constraint. This would allow the Council to bring forward housing more quickly in the early years of the plan period in a way that fits the overall strategic vision of the Local Plan.

We have sought to demonstrate within these representations that the site is achievable, suitable and deliverable for residential development which could be delivered within the first 5 years of the plan period. As such, we wish to support the proposed allocation under Policy A29 for development to the south and east of Ash and Tongham, including this site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents: 2016 07 18 GBC Pre Submission LP Representations Ash Grange Road Appendix 1.pdf (100 KB)

2016 07 18 GBC Pre Submission LP Representations Ash Grange Road.pdf (498 KB)

**Comment ID:** PSLPA16/4261  **Respondent:** 11659905 / Thakeham Homes (Anthony Heslehurst)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (north)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Thakeham Homes Ltd are submitting representations to the Guildford Pre Submission Local Plan as local stakeholders. Thakeham are a house builder based in Sussex with a track record for delivering high quality, sustainable schemes across Surrey, Sussex and Hampshire. We are progressing a number of potential development sites within this Borough at varying stages of the planning process, therefore our representations specifically relate to the role of the emerging Local Plan in the delivery of the Borough’s housing need over the plan period.

We wish to support the progression of the Local Plan and make comments within our representations on the basis that the proposed housing numbers should be increased in line with the requirements of the National Planning Policy Framework (NPPF) to meet the full, objectively assessed housing needs of the Borough.

We also wish to make representations with regard to the need for a clear and robust supply of housing sites in the first five years of the plan period, including through the identification of additional specific, deliverable sites for residential development. In addition, we also make representations to the proposed affordable housing policies and the need for flexibility to adapt to change. As such, these representations concern Policies S2 and H2 of the Pre Submission Plan and their relationship with the evidence base documents.

Land to the east of Chinthurst Lane, Shalford

These representations are submitted in respect of Thakeham Homes’ interests on land to the east of Chinthurst Lane, Shalford (‘the site’). The site is also known by Land Availability Assessment (LAA) reference 2034, and has been previously promoted to the Local Plan, including to the LAA and was assessed in the Green Belt and Countryside Study.

We support the proposed insetting of Shalford within the Green Belt in the Pre Submission Local Plan, however we wish to promote the land east of Chinthurst Lane for release from the Green Belt to provide much needed residential development in a sustainable location.

We confirm within these representations that the site is available and deliverable within the plan period and that it is set within a highly sustainable location. As such, we wish to make representations on the policies contained within the Pre Submission Local Plan, before addressing how these relate to the site.

Representations relating to Policy S2 ‘Housing Provision’

Since the publication of the NPPF in 2012, the central thrust of the Government’s planning strategy has been to ‘significantly boost’ the supply of housing, including a requirement for Local Planning Authorities (LPA) to meet the full, objectively assessed needs (OAN) for housing within their areas. Policy S2 sets out how the Council intends to meet the housing needs of the Borough over the plan period, therefore these representations relate to the adequacy of this policy in meeting these needs, with particular regard to the issues of the deficit in supply, the need to account for market signals, and the duty to cooperate. We suggest that potential solutions to housing supply could include the identification of additional housing site allocations and an increased windfall allowance to allow flexibility to adapt to changing needs.

Supply Deficit

As stated above, it is important that the plan genuinely addresses the full OAN for the Borough if the Council are to demonstrate a 5-year housing land supply in the early years of the emerging plan period. Significantly, the NPPF requires that where there has been a persistent under delivery of housing, a buffer of 20% should be applied to provide a realistic prospect of achieving the planned supply.

We note that housing supply within Guildford Borough has been somewhat low in recent years. The Council’s Land Availability Assessment (LAA) published February 2016 notes that as of the monitoring year 2015/16, there is an existing shortfall of at least 1,351 units, which is expected to increase to 2,019 units by monitoring year 2017/18. Based on the Council’s housing delivery expectations, the emerging Local Plan will not address this shortfall until the year 2026/27.

On the basis of the housing supply identified within the Pre Submission Local Plan, we do not consider that the Council would be able to sustain a 5 year housing land supply into the plan period, therefore it is our view that further sites should...
be identified to enable the Council to deliver more housing within the first 5 years. This will enable the Council to meet its OAN prior to larger strategic sites coming forward in accordance with the housing trajectory in the LAA.

**Improving affordability, having regard to market signals**

The NPPF explains at Paragraph 17 that there are certain underlying principles which should be applied when assessing housing need. One of these is the need to take into account of market signals, such as land prices and housing affordability:

“[Local Plans] should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area”

Expanding on this, the NPPG emphasises the importance of providing for relevant market signals in providing the full, objectively assessed housing needs of the area:

“The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings. Prices or rents rising faster than the national/local average may well indicate particular market undersupply relative to demand.”

NPPG, Paragraph 19

The Council acknowledges the increasing gap between earnings and average house prices, which is higher than the average for Surrey and significantly higher than the national average. The House Price Index (HPI) uses the Land Registry’s dataset of completed sales, and is reported on a monthly basis. In the most recent monthly report on 14th June 2016, the HPI revealed an 8.7% annual increase in house prices in Guildford to £418,806, compared with the national average house price of £224,731. Furthermore, the Index of Private Housing Rental Prices (IPHRP), which is produced by the Office for National Statistics on a quarterly basis, shows a 3.4% annual increase in private rents across the South East, compared to 2.6% in England and Wales as at May 2016.

It is our view that the extraordinary price and rent increases in the Borough are a market signal that additional housing is required in order to meet demand. This is at least a partial consequence of previous under delivery in the first 3 years of the plan period, and will likely worsen throughout the plan unless there is a significant boost to the supply of housing. With this in mind, we would recommend a number of additional housing site allocations to account for market signals in accordance with the NPPF and to enable the Council to demonstrate an ongoing five-year housing land supply.

**Duty to Cooperate**

The NPPF duty to cooperate requires that LPAs demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts, including the delivery of housing development to meet the full objectively assessed needs of the area:

“Local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position. Cooperation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development.”

NPPF 2012, Paragraph 181

The NPPF requires Local Plans to seek to deliver “the unmet requirements of neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development”

NPPF 2012, Paragraph 43

The West Surrey Strategic Housing Market Assessment (SHMA) September 2015 identifies important cross boundary interactions not only within the HMA, but also with neighbouring authorities:

“Although weaker than the core relationships, there are identifiable and important functional interactions with adjoining authorities of East Hampshire, Rushmoor, Surrey Heath, Runnymede and Elmbridge. In the context of the Duty to Cooperate, these authorities in particular should be engaged in strategic housing issues not only in the preparation of the
SHMA but also the subsequent development of plan policies.”
SHMA 2015, Paragraph 10.5

There is an unmet need for housing in Guildford’s neighbouring authorities, including Surrey Heath Borough, which has a claimed housing land supply of just 3.67 years, including a backlog of at least 721 dwellings since monitoring year 2011.

In addition, London is expected to have an unmet need of up to 200,000 dwellings over its current plan period (2015-2025). Research carried out by Nathaniel Lichfield and Partners for the consultation on the Further Alterations to the London Plan, indicated that Guildford could be expected to provide up to 2,177 dwellings over this period. At present, there is no indication of making any provision for this wider need within the Pre Submission Local Plan.

It is our view that opportunities still exist throughout Guildford Borough to deliver some or more housing in the most sustainable settlements in line with the objectives of national planning policy and in the spirit of the duty to cooperate. As such, it is our view that additional housing allocations are required to assist in meeting some of the identified need within neighbouring authorities, whilst also supporting the vitality of the communities within the towns and villages across the borough.

We consider that given the above uncertainties and the need for housing delivery in the first five years, a higher windfall allowance is required to enable flexibility in supply and facilitate suitable sites coming forward in the early years of the plan period.

Allocated Housing Sites

The Pre Submission Local Plan provides for the delivery of 13,860 dwellings in the plan period 2013-2033, including a number of smaller site allocations to deliver housing in the period 2019/20 to 2022/23. If delivery is provided in line with the plan, then the LAA housing trajectory estimates that there will be a cumulative deficit of around 900 dwellings after the first five years of the plan period.

There is therefore an additional need for housing within the first 5 years of the plan period. This can be best delivered by identifying a number of further housing site allocations in sustainable locations across the Borough and in the areas of lowest constraint to enable the Council to meet both its own housing need as well as assisting with meeting that of neighbouring authorities.

Representations Relating to Policy H2 ‘Affordable Housing’

The current thread of Government policy is clearly angled towards delivering a wide range of type and tenure of new housing, along with significantly boosting supply. Therefore, it is essential that local plans acknowledge the Government’s ambitions and seek to deliver the required level and type of housing required for their communities. As required through the tests of soundness, Policy H2 needs to be consistent with national planning policy, effective to ensure delivery over the plan period and also flexible enough to deal with changing circumstances.

Recently, the delivery of housing, especially affordable housing, has altered dramatically with various new proposals aimed at increasing the delivery of housing numbers. This wide range of housing now incorporates products such as starter homes, shared ownership, shared equity, discounted market rent, rent to buy and first buy products, along with market housing and affordable and social rent.

It is considered that, given the wide range of all housing products available, planning policy should be flexible enough to allow delivery of the appropriate mix of tenure and type without being overly prescriptive.

In addition we note that following the order of the Court of Appeal dated 13th May 2016 and the subsequent update to the NPPG, the Council need to amend the policy with regard to the thresholds for the provision of affordable housing – which should no longer be required on schemes of 10 units or fewer:

“There are specific circumstances where contributions for affordable housing and tariff style planning obligations (section 106 planning obligations) should not be sought from scall scale and self-build development. This follows the order of the Court of Appeal dated 13th May 2016, which gave effect to the policy set out in the Written Ministerial Statement on 28th
November 2014 and should be taken into account. These circumstances are that:

- Contributions should not be sought from developments of 10 units or less, and which have a maximum combined gross floodspace of no more than 1000sqm”

*NPPG Ref. 23b-031-20160519*

**Land to the east of Chinthurst Lane, Shalford**

Thakeham Homes wishes to recommend the site for residential development and as such supports the indicated changes to inset Shalford however we consider that the settlement boundary could be extended to include this site to provide much needed housing towards addressing the Borough’s objectively assessed needs. The red line location plan for the site has been appended to this representation at Appendix 1.

*Figure 1. Extract from Appendix H, showing the insetting of Shalford into the Green Belt.*

The site is located adjacent to the proposed inset settlement boundary east of Chinthurst Lane. As such, the site is set within a sustainable location, within walking distance of many local services and facilities, including a railway station and an infant school. Physically, the site benefits from few constraints, with a flat topography and good screening provided by trees, offering limited views in from the surrounding area. The site is located within flood risk zone 1, where there is considered to be the lowest risk of fluvial flooding.

This site is set within a highly sustainable location on the edge of the village, and would be suitable as an extension to the existing built area to provide much needed housing to meet the Borough’s needs.

**Availability**

The NPPG provides the following guidance in regard to considering whether a site is available for development:

“A site is considered available for development, when, on the best information available, there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips tenancies or operation requirements of landowners. This will often mean that land is controlled by a developer or landowner who has expressed an intention to develop”

*NPPG Paragraph 021 Ref. 3-020-20140306*

As highlighted within this representation, the site is controlled by Thakeham Homes Ltd and we will be actively engaging with the council to promote the site for the delivery of much needed residential development.

Thakeham has a proven track record for delivering a number of high quality residential schemes across Surrey, Sussex and Hampshire and will be seeking to deliver circa 20 dwellings on the site with a view to commencing development on site at the earliest opportunity.

**Suitability**

The NPPG provides the following guidance when considering whether a site is suitable for development:

“Sites in existing development plans or with planning permission will generally be considered suitable for development although it may be necessary to assess whether circumstances have changed which would alter their suitability”

*NPPG Paragraph 019 Ref. 019-20140306*

The site lies adjacent to the settlement boundary of Shalford, which is proposed to be inset from the Green Belt within the Pre Submission Local Plan. We support the proposed insetting of the village, and consider that this site could provide an extension to the built area to provide housing. The insetting of the settlement reflects the sustainability of the village and the suitability of the area as a location for some level of growth in the plan period.
As stated above, the site is set within a sustainable, edge-of-settlement location adjacent to the proposed settlement boundary. As such, we consider that the site is suitable for the delivery of residential development and should therefore be removed from the Green belt for this purpose.

**Achievability**

In determining whether a site is achievable for development, the NPPF provides the following guidance:

“A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of the site and the capacity of the developer to complete and let or sell the development over a certain period” NPPG, Paragraph 021 Ref. 021-20140306

Given the acute housing need within the Borough and the relative lack of constraint affecting this site, it is considered that there is a reasonable prospect of residential development being achieved on site within the plan period.

As stated above, Thakeham has a proven track record for delivering schemes of a similar size and scale throughout Surrey, Sussex and Hampshire, and has the capacity to deliver the development of the site to provide much needed new homes within the plan period.

**Deliverability**

For the reasons above, the site is considered to be available, suitable and achievable, and therefore deliverable in accordance with the NPPG. We have appended to this representation an indicative site plan without constraints to illustrate where development could potentially be delivered on the site.

**Conclusions**

In conclusion, we consider that an increase in housing land supply is required if the plan is to be consistent with national policy and therefore ‘sound’ with respect to the NPPF.

With regard to the expected shortfall of circa 2,000 dwellings by 2017/18, it is our view that at least a further 400 dwellings per annum are required in the first 5 years of the plan period, to enable the Council to meet its OAN prior to larger strategic sites coming forward in accordance with the housing trajectory in the LAA. In addition, we consider that the plan should account for market signals and the duty to cooperate, to ensure a robust and realistic housing land supply.

Given the issues discussed within this representation, it is our view that the council should work proactively to identify and include additional housing site allocations in sustainable locations in the towns and villages and areas of least constraint. This would allow the Council to bring forward housing more quickly in the early years of the plan period in a way that fits the overall strategic vision of the Local Plan.

We have demonstrated within these representations that the land east of Chinthurst Lane, Shalford, is available, suitable and deliverable for residential development in accordance with the relevant NPPG. As such, we recommend that this site is allocated to assist with meeting the Borough’s housing land supply shortfall, as the site is deliverable within the first 5 years of the plan period and provides a sustainable location for residential development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

- [2016 07 18 GBC Pre Submission LP Representations Shalford East of Chinthurst Lane Appendix 2.pdf](2016 07 18 GBC Pre Submission LP Representations Shalford East of Chinthurst Lane Appendix 2.pdf) (4.6 MB)
- [2016 07 18 GBC Pre Submission LP Representations Shalford East of Chinthurst Lane Appendix 1.pdf](2016 07 18 GBC Pre Submission LP Representations Shalford East of Chinthurst Lane Appendix 1.pdf) (1.3 MB)
- [2016 07 18 GBC Pre Submission LP Representations Shalford East of Chinthurst Lane.pdf](2016 07 18 GBC Pre Submission LP Representations Shalford East of Chinthurst Lane.pdf) (506 KB)

**Comment ID:** PSLPP16/10207  **Respondent:** 11659905 / Thakeham Homes (Anthony Heslehurst)  **Agent:**
Representations Relating to Policy H2 ‘Affordable Housing’

The current thread of Government policy is clearly angled towards delivering a wide range of type and tenure of new housing, along with significantly boosting supply. Therefore, it is essential that local plans acknowledge the Government’s ambitions and seek to deliver the required level and type of housing required for their communities. As required through the tests of soundness, Policy H2 needs to be consistent with national planning policy, effective to ensure delivery over the plan period and also flexible enough to deal with changing circumstances.

Recently, the delivery of housing, especially affordable housing, has altered dramatically with various new proposals aimed at increasing the delivery of housing numbers. This wide range of housing now incorporates products such as starter homes, shared ownership, shared equity, discounted market rent, rent to buy and first buy products, along with market housing and affordable and social rent.

It is considered that, given the wide range of all housing products available, planning policy should be flexible enough to allow delivery of the appropriate mix of tenure and type without being overly prescriptive.

In addition we note that following the order of the Court of Appeal dated 13th May 2016 and the subsequent update to the NPPG, the Council need to amend the policy with regard to the thresholds for the provision of affordable housing – which should no longer be required on schemes of 10 units or fewer:

“There are specific circumstances where contributions for affordable housing and tariff style planning obligations (section 106 planning obligations) should not be sought from small scale and self-build development. This follows the order of the Court of Appeal dated 13th May 2016, which gave effect to the policy set out in the Written Ministerial Statement on 28th November 2014 and should be taken into account. These circumstances are that:

- Contributions should not be sought from developments of 10 units or less, and which have a maximum combined gross floodspace of no more than 1000sqm” NPPG Ref. 23b-031-20160519

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17152  Respondent: 11659905 / Thakeham Homes (Anthony Heslehurst)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Representations Relating to Policy H2 ‘Affordable Housing’

The current thread of Government policy is clearly angled towards delivering a wide range of type and tenure of new housing, along with significantly boosting supply. Therefore, it is essential that local plans acknowledge the Government’s ambitions and seek to deliver the required level and type of housing required for their communities. As required through the tests of soundness, Policy H2 needs to be consistent with national planning policy, effective to ensure delivery over the plan period and also flexible enough to deal with changing circumstances.
Recently, the delivery of housing, especially affordable housing, has altered dramatically with various new proposals aimed at increasing the delivery of housing numbers. This wide range of housing now incorporates products such as starter homes, shared ownership, shared equity, discounted market rent, rent to buy and first buy products, along with market housing and affordable and social rent.

It is considered that, given the wide range of all housing products available, planning policy should be flexible enough to allow delivery of the appropriate mix of tenure and type without being overly prescriptive.

In addition we note that following the order of the Court of Appeal dated 13th May 2016 and the subsequent update to the NPPG, the Council need to amend the policy with regard to the thresholds for the provision of affordable housing – which should no longer be required on schemes of 10 units or fewer:

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- Contributions should not be sought from developments of 10 units or less, and which have a maximum combined gross floodspace of no more than 1000sqm” NPPG Ref. 23b-031-20160519

Land to the rear of Greenhill and Burnside, Chinthurst Lane, Shalford

Thakeham Homes wishes to recommend the site for residential development and as such supports the indicated changes to inset Shalford into the Green Belt in the Pre Submission Local Plan. The red line location plan for the site has been appended to this representation at Appendix 1.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18669  Respondent: 11659905 / Thakeham Homes (Anthony Heslehurst)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Representations Relating to Policy H2 ‘Affordable Housing’

The current thread of Government policy is clearly angled towards delivering a wide range of type and tenure of new housing, along with significantly boosting supply. Therefore, it is essential that local plans acknowledge the Government’s ambitions and seek to deliver the required level and type of housing required for their communities. As required through the tests of soundness, Policy H2 needs to be consistent with national planning policy, effective to ensure delivery over the plan period and also flexible enough to deal with changing circumstances.

Recently, the delivery of housing, especially affordable housing, has altered dramatically with various new proposals aimed at increasing the delivery of housing numbers. This wide range of housing now incorporates products such as starter homes, shared ownership, shared equity, discounted market rent, rent to buy and first buy products, along with market housing and affordable and social rent.
It is considered that, given the wide range of all housing products available, planning policy should be flexible enough to allow delivery of the appropriate mix of tenure and type without being overly prescriptive.

In addition we note that following the order of the Court of Appeal dated 13th May 2016 and the subsequent update to the NPPG, the Council need to amend the policy with regard to the thresholds for the provision of affordable housing – which should no longer be required on schemes of 10 units or fewer:

“There are specific circumstances where contributions for affordable housing and tariff style planning obligations (section 106 planning obligations) should not be sought from scall scale and self-build development. This follows the order of the Court of Appeal dated 13th May 2016, which gave effect to the policy set out in the Written Ministerial Statement on 28th November 2014 and should be taken into account. These circumstances are that:

- Contributions should not be sought from developments of 10 units or less, and which have a maximum combined gross floodspace of no more than 1000sqm”

NPPG Ref. 23b-031-20160519

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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Representations Relating to Policy I4 ‘Green and Blue Infrastructure’

Thakeham objects to the proposed designation of the site as ‘Open Space’ and the findings of the Council’s Assessment of Sites for Amenity Value document which has informed the designation.

Open Space is defined in the NPPF as follows:

“All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity”

With respect to open space designations in the Pre Submission Plan, Policy I4 states the following:

“Open space (encompassing all open space within urban areas, land designated as Open Space on the Policies Map and all land and water that provides opportunities for recreation and sport) will be protected from development in accordance with the NPPF.”

Pre Submission Local Plan, Policy I4, Page 119

At supporting Paragraph 4.6.55 of the ‘Reasoned Justification’, the Council explain that the identification of Open Spaces has been informed by the Amenity Assessment evidence base document:

“The Council has produced an Amenity Assessment to identify open spaces of public amenity value within villages that are inset from the Green Belt by the plan. This assessment looked at land within proposed village inset boundaries, excluding
land where inset boundaries were expanded to take in allocations on the edges of villages. Sites that were assessed as having public value that would be harmed by development are identified as Open Space on the Policies Map and will be protected in line with the NPPF. Open spaces outside inset village boundaries are protected by the Green Belt designation so have not been considered for further protection. Land of public value in the inset villages that is used for sport and recreation is identified through the Open Space Sport and Recreation Study and will be protected in line with the NPPF.” Pre Submission Local Plan, Paragraph 4.6.55

Following a site visit and basic desktop assessment, the Amenity Assessment deemed that the site (GIS Ref. ETH_088) had an amenity value score of ‘High’, accompanied by the following reasoning:

“Site is a grass field which is inaccessible to the public. The site is adjacent to a private sports centre. There is also Public Right of Way along the southern boundary. The site is in an elevated position and offers aesthetic value” Amenity Assessment, Page 118, Site Ref. ETH_088

As the site is private land which is inaccessible to the public and therefore has no amenity value with respect to providing opportunities for sports and recreation, it appears that the site has been designated entirely due to its ‘aesthetic value’ and that as a result the overall amenity value is scored as ‘High’. This is the only basis upon which the site is designated an Open Space within the Pre Submission Local Plan under Policy I4.

The site is well contained by high hedgerow to its southern boundaries adjacent to the public footpath, and is set substantially back from the road frontage of Chinthurst Lane. Due to the location and positioning of the site, there are very limited views towards the site from the public realm on Chinthurst Lane and further afield. The only views into the land are from private properties at first floor level, or from the private sports club. Which although being adjacent has not been identified within this policy.

To demonstrate the minimal visual amenity value of this site, we have appended a series of images at Appendix 2. These images show that the site is not visible from the public footpath, with the exception of over the entrance gate, and that there is very limited visibility towards the site from the public realm on Chinthurst Lane.

We object to the conclusion within the Amenity Assessment that this site is of high amenity value and we consider that the proposed allocation of the land as Open Space should be removed from the Local Plan.

The designation of sites of no amenity value is not consistent with the NPPF and does not constitute positive planning and would seriously compromise the ability of the Borough to provide much needed housing in sustainable locations within the villages and towns.

For the reasons above, it is our view that the Council should review the evidence basis, including the Amenity Assessment, and that the proposed Open Space allocation affecting this site should be removed to ensure that the plan reflects national planning policy.

This site is set within a highly sustainable location in the village, and would be suitable for residential development in the emerging plan period.

Availability

The NPPG provides the following guidance in regard to considering whether a site is available for development:

“A site is considered available for development, when, on the best information available, there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips tenancies or operation requirements of landowners. This will often mean that land is controlled by a developer or landowner who has expressed an intention to develop” NPPG Paragraph 021 Ref. 3-020-20140306

As highlighted within this representation, the site is controlled by Thakeham Homes Ltd and we will be actively engaging with the council over the coming months prior to submission of a full planning application for residential development.
Thakeham has a proven track record for delivering a number of high quality residential schemes across Surrey, Sussex and Hampshire and will be seeking to deliver circa 20 dwellings on the site with a view to commencing development on site at the earliest opportunity.

[Note: The respondent has advised that the above paragraph contains an error and should be amended as follows: “Thakeham has a proven track record for delivering a number of high quality residential schemes across Surrey, Sussex and Hampshire and will be seeking to deliver circa 200 dwellings on the site with a view to commencing development on site at the earliest opportunity.”]

Suitability

The NPPG provides the following guidance when considering whether a site is suitable for development:

“Sites in existing development plans or with planning permission will generally be considered suitable for development although it may be necessary to assess whether circumstances have changed which would alter their suitability” NPPG Paragraph 019 Ref. 019-20140306

The site lies within the village of Shalford which is proposed to be inset from the Green Belt. In addition, the site was found to be a suitable location for residential development within the LAA.

The site is also located on the edge of the settlement and is surrounding by existing residential and commercial development on all of its boundaries. There are a number of services and facilities in the local area, including a railway station and an infant school. Physical constraints to development in this location are also minimal. The site lies comfortably within Flood Risk Zone 1, where there is considered to be the lowest level of fluvial flood risk. There are no major ecology constraints and the site lies a significant distance from the Thames Basin Heaths SPA.

Achievability

In determining whether a site is achievable for development, the NPPF provides the following guidance:

“A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of the site and the capacity of the developer to complete and let or sell the development over a certain period” NPPG, Paragraph 021 Ref. 021-20140306

Given the acute housing need within the Borough and the relative lack of constraint affecting this site, it is considered that there is a reasonable prospect of residential development being achieved on site by 2021.

As stated above, Thakeham has a proven track record for delivering schemes of a similar size and scale throughout Surrey, Sussex and Hampshire, and has the capacity to deliver the development of the site to provide much needed new homes within the first 5 years of the plan period.

Deliverability

For the reasons above, the site is considered to be available, suitable and achievable, and therefore deliverable in accordance with the NPPG. In summary, we consider that this site has minimal or no amenity value and should not be designated as Open Space, and that the site is deliverable for residential development in the meaning of the NPPG.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 2016 07 18 GBC Pre Submission LP Representations Chinthurst Lane Appendix 1.pdf (382 KB) 2016 07 18 GBC Pre Submission LP Representations Chinthurst Lane Appendix 2.pdf (1.2 MB)
Representations relating to Policy S2 ‘Housing Provision’
Since the publication of the NPPF in 2012, the central thrust of the Government’s planning strategy has been to ‘significantly boost’ the supply of housing, including a requirement for Local Planning Authorities (LPA) to meet the full, objectively assessed needs (OAN) for housing within their areas. Policy S2 sets out how the Council intends to meet the housing needs of the Borough over the plan period, therefore these representations relate to the adequacy of this policy in meeting these needs, with particular regard to the issues of the deficit in supply, the need to account for market signals, and the duty to cooperate. We suggest that potential solutions to housing supply could include the identification of additional housing site allocations and an increased windfall allowance to allow flexibility to adapt to changing needs.

Supply Deficit
As stated above, it is important that the plan genuinely addresses the full OAN for the Borough if the Council are to demonstrate a 5-year housing land supply in the early years of the emerging plan period. Significantly, the NPPF requires that where there has been a persistent under delivery of housing, a buffer of 20% should be applied to provide a realistic prospect of achieving the planned supply.

We note that housing supply within Guildford Borough has been somewhat low in recent years. The Council’s Land Availability Assessment (LAA) published February 2016 notes that as of the monitoring year 2015/16, there is an existing shortfall of at least 1,351 units, which is expected to increase to 2,019 units by monitoring year 2017/18. Based on the Council’s housing delivery expectations, the emerging Local Plan will not address this shortfall until the year 2026/27.

On the basis of the housing supply identified within the Pre Submission Local Plan, we do not consider that the Council would be able to sustain a 5 year housing land supply into the plan period, therefore it is our view that further sites should be identified to enable the Council to deliver more housing within the first 5 years. This will enable the Council to meet its OAN prior to larger strategic sites coming forward in accordance with the housing trajectory in the LAA.

Improving affordability, having regard to market signals
The NPPF explains at Paragraph 17 that there are certain underlying principles which should be applied when assessing housing need. One of these is the need to take into account market signals, such as land prices and housing affordability:
“[Local Plans] should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area”
NPPF 2012, Paragraph 17

Expanding on this, the NPPG emphasises the importance of providing for relevant market signals in providing the full, objectively assessed housing needs of the area:
“The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings. Prices or rents rising faster than the national/local average may well indicate particular market undersupply relative to demand.”
NPPG, Paragraph 19

The Council acknowledges the increasing gap between earnings and average house prices, which is higher than the average for Surrey and significantly higher than the national average. The House Price Index (HPI) uses the Land Registry’s dataset of completed sales, and is reported on a monthly basis. In the most recent monthly report on 14th June 2016, the HPI revealed an 8.7% annual increase in house prices in Guildford to £418,806, compared with the national average house price of £224,731. Furthermore, the Index of Private Housing Rental Prices (IPHRP), which is produced by the Office for National Statistics on a quarterly basis, shows a 3.4% annual increase in private rents across the South East, compared to 2.6% in England and Wales as at May 2016.

It is our view that the extraordinary price and rent increases in the Borough are a market signal that additional housing is required in order to meet demand. This is at least a partial consequence of previous under delivery in the first 3 years of the plan period, and will likely worsen throughout the plan unless there is a significant boost to the supply of housing. With this in mind, we would recommend a number of additional housing site allocations to account for market signals in
accordance with the NPPF and to enable the Council to demonstrate an ongoing five-year housing land supply.

Duty to Cooperate

The NPPF duty to cooperate requires that LPAs demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts, including the delivery of housing development to meet the full objectively assessed needs of the area:

“The Local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position. Cooperation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development.”

NPPF 2012, Paragraph 181

The NPPF requires Local Plans to seek to deliver “the unmet requirements of neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development”

NPPF 2012, Paragraph 43

The West Surrey Strategic Housing Market Assessment (SHMA) September 2015 identifies important cross boundary interactions not only within the HMA, but also with neighbouring authorities:

“Although weaker than the core relationships, there are identifiable and important functional interactions with adjoining authorities of East Hampshire, Rushmoor, Surrey Heath, Runnymede and ELMbridge. In the context of the Duty to Cooperate, these authorities in particular should be engaged in strategic housing issues not only in the preparation of the SHMA but also the subsequent development of plan policies.”

SHMA 2015, Paragraph 10.5

There is an unmet need for housing in Guildford’s neighbouring authorities, including Surrey Heath Borough, which has a claimed housing land supply of just 3.67 years, including a backlog of at least 721 dwellings since monitoring year 2011. In addition, London is expected to have an unmet need of up to 200,000 dwellings over its current plan period (2015-2025).

Research carried out by Nathaniel Lichfield and Partners for the consultation on the Further Alterations to the London Plan, indicated that Guildford could be expected to provide up to 2,177 dwellings over this period. At present, there is no indication of making any provision for this wider need within the Pre Submission Local Plan. It is our view that opportunities still exist throughout Guildford Borough to deliver some or more housing in the most sustainable settlements in line with the objectives of national planning policy and in the spirit of the duty to cooperate. As such, it is our view that additional housing allocations are required to assist in meeting some of the identified need within neighbouring authorities, whilst also supporting the vitality of the communities within the towns and villages across the borough.

We consider that given the above uncertainties and the need for housing delivery in the first five years, a higher windfall allowance is required to enable flexibility in supply and facilitate suitable sites coming forward in the early years of the plan period.

Allocated Housing Sites

The Pre Submission Local Plan provides for the delivery of 13,860 dwellings in the plan period 2013-2033, including a number of smaller site allocations to deliver housing in the period 2019/20 to 2022/23. If delivery is provided in line with the plan, then the LAA housing trajectory estimates that there will be a cumulative deficit of around 900 dwellings after the first five years of the plan period.

There is therefore an additional need for housing within the first 5 years of the plan period. This can be best delivered by identifying a number of further housing site allocations in sustainable locations across the Borough and in the areas of lowest constraint to enable the Council to meet both its own housing need as well as assisting with meeting that of neighbouring authorities.

In conclusion, we consider that an increase in housing land supply is required if the plan is to be consistent with national policy and therefore ‘sound’ with respect to the NPPF.

With regard to the expected shortfall of circa 2,000 dwellings by 2017/18, it is our view that at least a further 400 dwellings per annum are required in the first 5 years of the plan period, to enable the Council to meet its OAN prior to larger strategic sites coming forward in accordance with the housing trajectory in the LAA. In addition, we consider that the plan should account for market signals and the duty to cooperate, to ensure a robust and realistic housing land supply.

Given the issues discussed within this representation, it is our view that the council should work proactively to identify and include additional site allocations in sustainable locations in the towns and villages and areas of least constraint. This would allow the Council to bring forward housing more quickly in the early years of the plan period in a way that fits the overall
strategic vision of the Local Plan. We trust that these representations will be useful and clear and we would be grateful for confirmation of receipt. In the meantime, please do not hesitate to contact me if you have any queries or require any further information.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17151  Respondent: 11659905 / Thakeham Homes (Anthony Heslehurst)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Guildford Pre Submission Local Plan – Representations
Re. Land to the rear of Greenhill and Burnside, Chinthurst Lane, Shalford

Thakeham Homes Ltd are submitting representations to the Guildford Pre Submission Local Plan as local stakeholders. Thakeham are a house builder based in Sussex with a track record for delivering high quality, sustainable schemes across Surrey, Sussex and Hampshire. We are progressing a number of potential development sites within this Borough at varying stages of the planning process, therefore our representations specifically relate to the role of the emerging Local Plan in the delivery of the Borough’s housing need over the plan period.

We wish to support the progression of the Local Plan and make comments within our representations on the basis that the proposed housing numbers should be increased in line with the requirements of the National Planning Policy Framework (NPPF) to meet the full, objectively assessed housing needs of the Borough.

We also wish to make representations with regard to the need for a clear and robust supply of housing sites in the first five years of the plan period, including through the identification of additional specific, deliverable sites for residential development. In addition, we also make representations to the proposed affordable housing policies and the need for flexibility to adapt to change. As such, these representations concern Policies S2 and H2 of the Pre Submission Plan and their relationship with the evidence base documents.

Land to the rear of Greenhill and Burnside, Chinthurst Lane, Shalford

These representations are submitted in respect of Thakeham Homes’ interests on land to the rear of Greenhill and Burnside, Chinthurst Lane, Shalford (‘the site’). The site is also known by LAA reference 1264, and has been previously promoted to the Local Plan, including to the Draft Local Plan consultation in autumn 2014.

We wish to support the proposed insetting of Shalford within the Green Belt in the Pre Submission Local Plan, however we object to the proposed designation of the site as ‘Open Space’ and the findings contained within the Amenity Assessment, which does not in our view provide sufficient justification for the allocation.

We confirm within these representations that the site is available and deliverable in the short-term, within the first 5 years of the plan period and that it is set within a highly sustainable location. As such, we wish to make representations on the main policies contained within the Pre Submission Local Plan, before addressing how these relate to the site.

Representations relating to Policy S2 ‘Housing Provision’
Since the publication of the NPPF in 2012, the central thrust of the Government’s planning strategy has been to ‘significantly boost’ the supply of housing, including a requirement for Local Planning Authorities (LPA) to meet the full, objectively assessed needs (OAN) for housing within their areas. Policy S2 sets out how the Council intends to meet the housing needs of the Borough over the plan period, therefore these representations relate to the adequacy of this policy in meeting these needs, with particular regard to the issues of the deficit in supply, the need to account for market signals, and the duty to cooperate. We suggest that potential solutions to housing supply could include the identification of additional housing site allocations and an increased windfall allowance to allow flexibility to adapt to changing needs.

Supply Deficit

As stated above, it is important that the plan genuinely addresses the full OAN for the Borough if the Council are to demonstrate a 5-year housing land supply in the early years of the emerging plan period. Significantly, the NPPF requires that where there has been a persistent under delivery of housing, a buffer of 20% should be applied to provide a realistic prospect of achieving the planned supply.

We note that housing supply within Guildford Borough has been somewhat low in recent years. The Council’s Land Availability Assessment (LAA) published February 2016 notes that as of the monitoring year 2015/16, there is an existing shortfall of at least 1,351 units, which is expected to increase to 2,019 units by monitoring year 2017/18. Based on the Council’s housing delivery expectations, the emerging Local Plan will not address this shortfall until the year 2026/27.

On the basis of the housing supply identified within the Pre Submission Local Plan, we do not consider that the Council would be able to sustain a 5 year housing land supply into the plan period, therefore it is our view that further sites should be identified to enable the Council to deliver more housing within the first 5 years. This will enable the Council to meet its OAN prior to larger strategic sites coming forward in accordance with the housing trajectory in the LAA.

Improving affordability, having regard to market signals

The NPPF explains at Paragraph 17 that there are certain underlying principles which should be applied when assessing housing need. One of these is the need to take into account market signals, such as land prices and housing affordability:

“[Local Plans] should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area”

Expanding on this, the NPPG emphasises the importance of providing for relevant market signals in providing the full, objectively assessed housing needs of the area:

“The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings. Prices or rents rising faster than the national/local average may well indicate particular market undersupply relative to demand.”

NPPG, Paragraph 19

The Council acknowledges the increasing gap between earnings and average house prices, which is higher than the average for Surrey and significantly higher than the national average. The House Price Index (HPI) uses the Land Registry’s dataset of completed sales, and is reported on a monthly basis. In the most recent monthly report on 14th June 2016, the HPI revealed an 8.7% annual increase in house prices in Guildford to £418,806, compared with the national average house price of £224,731. Furthermore, the Index of Private Housing Rental Prices (IPHRP), which is produced by the Office for National Statistics on a quarterly basis, shows a 3.4% annual increase in private rents across the South East, compared to 2.6% in England and Wales as at May 2016.

It is our view that the extraordinary price and rent increases in the Borough are a market signal that additional housing is required in order to meet demand. This is at least a partial consequence of previous under delivery in the first 3 years of the plan period, and will likely worsen throughout the plan unless there is a significant boost to the supply of housing. With this in mind, we would recommend a number of additional housing site allocations to account for market signals in accordance with the NPPF and to enable the Council to demonstrate an ongoing five-year housing land supply.

Duty to Cooperate
The NPPF duty to cooperate requires that LPAs demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts, including the delivery of housing development to meet the full objectively assessed needs of the area:

“Local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position. Cooperation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development.” NPPF 2012, Paragraph 181

The NPPF requires Local Plans to seek to deliver “the unmet requirements of neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development” NPPF 2012, Paragraph 43

The West Surrey Strategic Housing Market Assessment (SHMA) September 2015 identifies important cross boundary interactions not only within the HMA, but also with neighbouring authorities:

“Although weaker than the core relationships, there are identifiable and important functional interactions with adjoining authorities of East Hampshire, Rushmoor, Surrey Heath, Runnymede and Elmbridge. In the context of the Duty to Cooperate, these authorities in particular should be engaged in strategic housing issues not only in the preparation of the SHMA but also the subsequent development of plan policies.” SHMA 2015, Paragraph 10.5

There is an unmet need for housing in Guildford’s neighbouring authorities, including Surrey Heath Borough, which has a claimed housing land supply of just 3.67 years, including a backlog of at least 721 dwellings since monitoring year 2011. In addition, London is expected to have an unmet need of up to 200,000 dwellings over its current plan period (2015-2025). Research carried out by Nathaniel Lichfield and Partners for the consultation on the Further Alterations to the London Plan, indicated that Guildford could be expected to provide up to 2,177 dwellings over this period. At present, there is no indication of making any provision for this wider need within the Pre Submission Local Plan.

It is our view that opportunities still exist throughout Guildford Borough to deliver some or more housing in the most sustainable settlements in line with the objectives of national planning policy and in the spirit of the duty to cooperate. As such, it is our view that additional housing allocations are required to assist in meeting some of the identified need within neighbouring authorities, whilst also supporting the vitality of the communities within the towns and villages across the borough.

We consider that given the above uncertainties and the need for housing delivery in the first five years, a higher windfall allowance is required to enable flexibility in supply and facilitate suitable sites coming forward in the early years of the plan period.

Allocated Housing Sites

The Pre Submission Local Plan provides for the delivery of 13,860 dwellings in the plan period 2013-2033, including a number of smaller site allocations to deliver housing in the period 2019/20 to 2022/23. If delivery is provided in line with the plan, then the LAA housing trajectory estimates that there will be a cumulative deficit of around 900 dwellings after the first five years of the plan period.

There is therefore an additional need for housing within the first 5 years of the plan period. This can be best delivered by identifying a number of further housing site allocations in sustainable locations across the Borough and in the areas of lowest constraint to enable the Council to meet both its own housing need as well as assisting with meeting that of neighbouring authorities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/17154  Respondent: 11659905 / Thakeham Homes (Anthony Heslehurst)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Conclusions

In conclusion, we consider that an increase in housing land supply is required if the plan is to be consistent with national policy and therefore ‘sound’ with respect to the NPPF.

With regard to the expected shortfall of circa 2,000 dwellings by 2017/18, it is our view that at least a further 400 dwellings per annum are required in the first 5 years of the plan period, to enable the Council to meet its OAN prior to larger strategic sites coming forward in accordance with the housing trajectory in the LAA. In addition, we consider that the plan should account for market signals and the duty to cooperate to ensure a robust and realistic housing land supply.

Given the issues discussed within this representation, it is our view that the council should work proactively to identify and include additional housing site allocations in sustainable locations in the towns and villages and areas of least constraint. This would allow the Council to bring forward housing more quickly in the early years of the plan period in a way that fits the overall strategic vision of the Local Plan. As stated above, we recommend the land to the rear of Greenhill and Burnside, Shalford, is removed from policy I4 as open space due to its minimal amenity value. We have also demonstrated within these representations that we consider the site to be achievable, suitable and achievable for residential development.

We trust that these representations will be useful and clear and we would be grateful for confirmation of receipt. In the meantime, please do not hesitate to contact me if you have any queries or require any further information.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- 2016 07 18 GBC Pre Submission LP Representations Chinthurst Lane Appendix 1.pdf (382 KB)
- 2016 07 18 GBC Pre Submission LP Representations Chinthurst Lane Appendix 2.pdf (1.2 MB)
- 2016 07 18 GBC Pre Submission LP Representations Chinthurst Lane.pdf (469 KB)

Comment ID: PSLPP16/18668  Respondent: 11659905 / Thakeham Homes (Anthony Heslehurst)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Guildford Pre Submission Local Plan – Representations Re. Ash, Land North of Grange Road

Thakeham Homes Ltd are submitting representations to the Guildford Pre Submission Local Plan as local stakeholders. Thakeham are a house builder based in Sussex with a track record for delivering high quality, sustainable schemes across Surrey, Sussex and Hampshire. We are progressing a number of potential development sites within this Borough at varying stages of the planning process, therefore our representations specifically relate to the role of the emerging Local Plan in the delivery of the Borough’s housing need over the plan period.

We wish to support the progression of the Local Plan and make comments within our representations on the basis that the proposed housing numbers should be increased in line with the requirements of the National Planning Policy Framework (NPPF) to meet the full, objectively assessed housing needs of the Borough.

We also wish to make representations with regard to the need for a clear and robust supply of housing sites in the first five years of the plan period, including through the identification of additional specific, deliverable sites for residential development. In addition, we also make representations to the proposed affordable housing policies and the need for flexibility to adapt to change. As such, these representations concern Policies S2 and H2 of the Pre Submission Plan and their relationship with the evidence base documents.

Land to the North of Grange Road, Ash

These representations are submitted in respect of Thakeham Homes’ interests north of Grange Road, Ash (‘the site’). The site is also known by LAA reference 2247, and is included within the proposed strategic allocation ‘A29 Land south and east of Ash and Tongham’. A red line location plan for the site is appended to this representation at Appendix 1.

We confirm within these representations that the site is available and deliverable within the first 5 years of the plan period and that it is set within a highly sustainable location. As such, we wish to make representations on the policies contained within the Pre Submission Local Plan, and support the proposed allocation of the site for residential development.

Representations relating to Policy S2 ‘Housing Provision’

Since the publication of the NPPF in 2012, the central thrust of the Government’s planning strategy has been to ‘significantly boost’ the supply of housing, including a requirement for Local Planning Authorities (LPA) to meet the full, objectively assessed needs (OAN) for housing within their areas. Policy S2 sets out how the Council intends to meet the housing needs of the Borough over the plan period, therefore these representations relate to the adequacy of this policy in meeting these needs, with particular regard to the issues of the deficit in supply, the need to account for market signals, and the duty to cooperate. We suggest that potential solutions to housing supply could include the identification of additional housing site allocations and an increased windfall allowance to allow flexibility to adapt to changing needs.

Supply Deficit

As stated above, it is important that the plan genuinely addresses the full OAN for the Borough if the Council are to demonstrate a 5-year housing land supply in the early years of the emerging plan period. Significantly, the NPPF requires that where there has been a persistent under delivery of housing, a buffer of 20% should be applied to provide a realistic prospect of achieving the planned supply.

We note that housing supply within Guildford Borough has been somewhat low in recent years. The Council’s Land Availability Assessment (LAA) published February 2016 notes that as of the monitoring year 2015/16, there is an existing shortfall of at least 1,351 units, which is expected to increase to 2,019 units by monitoring year 2017/18. Based on the Council’s housing delivery expectations, the emerging Local Plan will not address this shortfall until the year 2026/27.

On the basis of the housing supply identified within the Pre Submission Local Plan, we do not consider that the Council would be able to sustain a 5 year housing land supply into the plan period, therefore it is our view that further sites should be identified to enable the Council to deliver more housing within the first 5 years. This will enable the Council to meet its OAN prior to larger strategic sites coming forward in accordance with the housing trajectory in the LAA.

Improving affordability, having regard to market signals
The NPPF explains at Paragraph 17 that there are certain underlying principles which should be applied when assessing housing need. One of these is the need to take into account market signals, such as land prices and housing affordability:

“[Local Plans] should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area”
NPPF 2012, Paragraph 17

Expanding on this, the NPPG emphasises the importance of providing for relevant market signals in providing the full, objectively assessed housing needs of the area:

“The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings. Prices or rents rising faster than the national/local average may well indicate particular market undersupply relative to demand.”
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The Council acknowledges the increasing gap between earnings and average house prices, which is higher than the average for Surrey and significantly higher than the national average. The House Price Index (HPI) uses the Land Registry’s dataset of completed sales, and is reported on a monthly basis. In the most recent monthly report on 14th June 2016, the HPI revealed an 8.7% annual increase in house prices in Guildford to £418,806, compared with the national average house price of £224,731. Furthermore, the Index of Private Housing Rental Prices (IPHRP), which is produced by the Office for National Statistics on a quarterly basis, shows a 3.4% annual increase in private rents across the South East, compared to 2.6% in England and Wales as at May 2016.

It is our view that the extraordinary price and rent increases in the Borough are a market signal that additional housing is required in order to meet demand. This is at least a partial consequence of previous under delivery in the first 3 years of the plan period, and will likely worsen throughout the plan unless there is a significant boost to the supply of housing. With this in mind, we would recommend a number of additional housing site allocations to account for market signals in accordance with the NPPF and to enable the Council to demonstrate an ongoing five-year housing land supply.

Duty to Cooperate

The NPPF duty to cooperate requires that LPAs demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts, including the delivery of housing development to meet the full objectively assessed needs of the area:

“Local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position. Cooperation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development.”
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SHMA 2015, Paragraph 10.5
There is an unmet need for housing in Guildford’s neighbouring authorities, including Surrey Heath Borough, which has a claimed housing land supply of just 3.67 years, including a backlog of at least 721 dwellings since monitoring year 2011.

In addition, London is expected to have an unmet need of up to 200,000 dwellings over its current plan period (2015-2025). Research carried out by Nathaniel Lichfield and Partners for the consultation on the Further Alterations to the London Plan, indicated that Guildford could be expected to provide up to 2,177 dwellings over this period. At present, there is no indication of making any provision for this wider need within the Pre Submission Local Plan.

It is our view that opportunities still exist throughout Guildford Borough to deliver some or more housing in the most sustainable settlements in line with the objectives of national planning policy and in the spirit of the duty to cooperate. As such, it is our view that additional housing allocations are required to assist in meeting some of the identified need within neighbouring authorities, whilst also supporting the vitality of the communities within the towns and villages across the borough.

We consider that given the above uncertainties and the need for housing delivery in the first five years, a higher windfall allowance is required to enable flexibility in supply and facilitate suitable sites coming forward in the early years of the plan period.

**Allocated Housing Sites**

The Pre Submission Local Plan provides for the delivery of 13,860 dwellings in the plan period 2013-2033, including a number of smaller site allocations to deliver housing in the period 2019/20 to 2022/23. If delivery is provided in line with the plan, then the LAA housing trajectory estimates that there will be a cumulative deficit of around 900 dwellings after the first five years of the plan period.

There is therefore an additional need for housing within the first 5 years of the plan period. This can be best delivered by identifying a number of further housing site scale allocations in sustainable locations across the Borough and in the areas of lowest constraint to enable the Council to meet both its own housing need as well as assisting with meeting that of neighbouring authorities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp173/694  **Respondent:** 11716417 / Solum Regeneration (Solum Regeneration)  **Agent:** Nathaniel Lichfield & Partners (Dennis Pope)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**Summary**

The omission of an adjustment for London is a significant flaw in both the SHMA and the addendum, leading to an underestimate of future demographic-led need in both Guildford and the West Surrey HMA. Whilst a sensitivity was undertaken in the West Surrey SHMA, which showed an increase in need in Guildford under the London migration scenario, this was not incorporated into the SHMA's conclusions on OAHN. In the addendum, despite there being no significant change in the evidence, it is concluded that no adjustment is required. This is despite the evidence for Guildford in particular clearly showing that net migration fell significantly in the immediate aftermath of the recession, and has yet to begin recovering.
Overall the addendum has failed to sufficiently demonstrate that an adjustment for London should not be made, and in doing so has under-estimate future demographic-led housing need for Guildford (and the HMA in the SHMA).

**Economic Growth**

3.19 With regards to employment-led needs, there are two aspects of the relevant section of the PPG (Reference ID: 2a-018 20140306). The first relates to the scale of job growth within the HMA:

"Plan makers should make an assessment of the likely change in job numbers based on past trends and/or economic forecasts as appropriate and also having regard to the growth of the working age population in the housing market area ..."

3.20 The second then relates to the issues associated with areas where there is a mismatch, and refers to the issues of unsustainable commuting patterns and the resilience of local businesses. It states:

"Where the supply of working age population that is economically active (labour force supply) is less than the projected job growth, this could result in unsustainable commuting patterns (depending on public transport accessibility or other sustainable options such as walking or cycling) and could reduce the resilience of local businesses. In such circumstances, plan makers will need to consider how the location of new housing or infrastructure development could help address these problems."

3.21 In determining the overall scale of job growth the SHMA used forecasts from Cambridge Econometrics, Experian and Oxford Economics dated 2015. These sources showed growth of between 0.6% and 1.1% per annum for Guildford, averaging 0.9% per annum (amounting to 17,700 jobs in Guildford) which was applied within the assessment of need. For Guildford, this showed a need for 637 dwellings per annum.

3.22 The addendum applies an updated forecast of growth using forecasts dated 2016, which show growth of 0.7% per annum, amounting to growth of 12,893 jobs over the [new] projection period 2015-34. However, it does not present any analysis to show what the impact of this reduced forecast of growth in Guildford is across the rest of the HMA. It may be the case that lower growth in Guildford is simply offset by higher forecast growth in the rest of the HMA, where the other two Districts (Woking and Waverley) would need to increase their level of housing provision to account for higher levels of job growth. The risks associated with adopting this 'pick and choose' approach are set out in detail above in paragraphs 3.8-3.9, primarily the risk of creating unmet need as the need for more housing elsewhere in the HMA is unaccounted for.

**Summary**

3.23 The addendum has failed to demonstrate that lower job growth in Guildford is not countered by higher job growth elsewhere in the HMA. The most recent assessment undertaken consistently across the HMA is that within the SHMA, which demonstrated a need for 637 dwellings per annum in Guildford. If the new forecasts show lower growth in Guildford but higher growth in Waverley and Woking, the housing needs in those areas will need to be increased to balance the reduction in Guildford. For Guildford to reduce its OAN on the basis of lower job growth without considering the impact of updated forecasts across the HMA risks creating unmet need in the housing market area, reducing the resilience of local businesses or generating unsustainable commuting patterns.

**Market signals**

The SHMA and addendum consider a response to market signals has been adequately addressed by making an adjustment to household formation rates for 25-34 age group. However this is wholly insufficient because: - The PPG indicates that adjustments to household formation rates and for market signals are separate stages in the calculation (headship rates in ID 2a-015 and market signals in ID 2a-020); - Modelling household formation as a precise response for market signals doesn't seek to consider what impact it has on improving affordability. Market signals/affordability affects other age groups, and the PPG is clear that the purpose of a market signals uplift is to provide more than the household projections, hence it is necessary for any market signals uplift to be in excess of the figure suggested by the household projections. - Overall uplift in Guildford of 9.0% above demographic/economic-led needs is exceptionally modest in the context of the affordability pressure that exists in the District and unlikely to be a sufficient response to market signals.

**Waverley Local Plan- Inspector's Initial Questions**

3.25 The approach in the West Surrey SHMA (which is the same as that in the addendum) has already been considered in Waverley. The Local Plan Inspector's Matters and Issues for Examination (ID-3) (April 2017) stated:

"... having considered the written evidence, I do not consider that the OAN adjustment to improve affordability is
adequate. Focusing on household formation suppression for one age group results in a vent minor uplift and I have seen no
evidence that this would improve overall affordability. The lowest quartile affordability ratio is extremely poor. In
evaluating the scale of uplift required to improve affordability it is not adequate simply to benchmark against neighbouring
authorities and I do not accept the argument that uplift will not improve affordability; such an approach is contrary to
Planning Policy Guidance. Evidences required to demonstrate clearly a link between uplift and improved affordability”.

With the approach put forward in the SHMA already in question by the Waverley Local Plan Inspector it is unlikely that
the same approach in Guildford can continue to be considered adequate. As such, an alternative approach to market signals
is set out below, reflecting the requirements of the PPG.

Approach to market signals - PPG

3.26 The PPG sets out a clear two-stepped process to addressing market signals within the calculation of OAN:

1 Firstly, to determine whether a market signals uplift is necessary. This is set out in PPG ID2a-019 within the first sub-
paragraph as follows:
"Appropriate comparisons of indicators should be made ... A worsening trend in any of these indicators will require upward
adjustment to planned housing numbers compared to ones based solely on household projections."

2 Secondly, when a market signals uplift is required, to identify what scale that should be set at with guidance given that it
should be set at a level that could be expected to improve affordability. This is set out in PPG ID2a-019 within the second
and third sub-paragraphs as follows:
'In areas where an upward adjustment is required, plan makers should set this adjustment at a level that is reasonable ... they
should increase planned supply by an amount that, on reasonable assumptions and consistent with principles of sustainable development, could be expected to
improve affordability and monitor the response of the market over the plan period."

In respect of the evidence underpinning the Guildford local plan, the first step is not in dispute. The West Surrey SHMA
assesses the market signals and concludes that affordability pressures in the West Surrey HMA are "significant" (page 115-
key messages), with affordability pressures described as "severe" and that an upward adjustment should be applied (para
7.47). It is the second step that is in dispute, and whether the SHMAs response to this can be viewed to be one that "on
reasonable assumptions ... could be expected to improve affordability". As set out above, the Waverley Local Plan
Inspector has already stated that the scale of uplift put forward in the West Surrey SHMA is insufficient.

3.28 For clarity, the West Surrey SHMA’s response to market signals is to adjust household formation (‘headship’) rates for
the 25-34 year age band, so that they increase back to their 2001 levels (para 7.53), and this adjustment is applied on the
employment-led scenario. This approach remains the same in the Guildford addendum, and is considered inappropriate in
light of the Waverley Local Plan Inspectors initial comments and the guidance in the PPG, which is discussed in further
detail below. The outcome of applying this headship rates adjustment in the SHMA in Guildford amounts to a 31 dpa uplift
on the employment-led needs of 637 dpa (equivalent to an uplift of 5%) and in the addendum this amounts to a 52 dpa
uplift on the employment-led needs of 579 (equivalent to an uplift of 9%).

The principle of market signals uplift to improve affordability

The purpose of a market signals uplift is to ensure the Government's housing aims (as expressed in the NPPF) are met and
to ensure this is reflected in assessments of need by making "upward adjustment to planned housing numbers compared to
ones based solely on household projections" (PPG ID2a-o2o) where market signals indicate such an adjustment is
necessary. The principle of providing 'more' than 'unvarnished' household projections in England has long been established
through successive assessments of the country's problems with lack of housing supply.

A literature review of these assessments is included at Appendix 1. They demonstrate, over a sustained period, a
consensus over the need to increase supply above household projections to deliver improvements in housing affordability.
This has continued to underpin successive Governments' approach to assessing housing need, including within the PPG and
more recently as recognised within the Housing White Paper. Across these reports, the evidence would suggest that - at the
national level- an uplift of between 20.9% and 44.2% above the number of homes implied by household projections alone
would be necessary to deliver improvements in affordability.
Under the current planning system, achieving a national outcome for housing supply is the product of implementing a large number of individual local plans. As such it is fundamentally necessary to link any local strategies to the overarching national principles which are driving Government policy (i.e. ‘think global, act local’). Each area will have its role to play in contributing towards the Government's aims; some more than others, based on their circumstances. This is explicitly acknowledged in the SHMA by GL Hearn (key messages, page 115 bullet point 3).

It is acknowledged that housing supply is but one factor influencing the affordability of housing (availability of credit and household incomes being two other key influencers), but the role of the planning system in increasing supply to achieve this is clearly an important lever available to government, and one that it seeks to apply through PPG-compliant assessments of OAN. 3.33 Whilst the above places the market signals uplift within the national context, how this overarching principle, is applied to local evidence in Guildford and West Surrey is considered below.

How do we define an improvement in affordability?

3.34 The PPG states that the ratio between lower quartile house prices and the lower quartile income or earnings can be used to measure affordability and this is the metric around which we have focused our analysis in this paper. Although the PPG (ID: 2a-o2o) sets out that plan maker should "increase planned supply by an amount that ... could be expected to improve affordability", the reference case for that improvement is not stated. The PPG (ID2a-003) requires that the assessment of need "should be proportionate and does not require local councils to consider purely hypothetical future scenarios, only future scenarios that could be reasonably expected to occur." In this regard, any improvement to affordability should be one that is reasonably expected to occur.

3.35 Measuring improvements in affordability should make reference not only to current levels of affordability but also to any forecast change in affordability were housing supply to progress at a level consistent with official projections. This must be set in the context that the lower quartile affordability ratio in Guildford was 12.2 in 2016, and has been steadily worsening in recent years (see most recent data released March 2017 in Appendix 2). 3.36 The Office for Budget Responsibility (OBR) produces forecasts of both house prices and wages and analysis on the inter-relationship between the two factors2. • We present analysis later in this note (and at Appendix 3) which applies these assumptions to Guildford; this forecasts that if housing supply increased in line with the OAN for Guildford set out in the addendum (i.e. at 654 dpa over the period 2015-34), the affordability ratio would worsen to 14.4 by the end of the plan period in 2034.

3.37 On this basis, we consider that, any increase in planned supply (as required by the PPG3) should as a minimum be such as to stabilise, and preferably improve given it is above the rest of the HMA, the current affordability ratio in Guildford (12.2). Even stabilising the affordability ratio at the current level would represent a better outcome than the reference case of continued worsening affordability in the District. This is a goal that was recognised by the NHPAU in its work and by the House of Lords Select Committee on Economic Affairs4 both of which we review in Appendix 1.

An evidence based market signals uplift for Guildford and West Surrey

3.38 There are numerous methodological approaches that can be adopted in seeking to quantify an appropriate market signals uplift for Guildford based on local evidence of affordability and market signals in the District and the HMA. The PPG does not set out a single definitive approach. Indeed, it suggests (ID: 2a-020) that the approach is one where- having established that an uplift is required:


1 the adjustment should be one that is reasonable;
2 The scale of adjustment should be related to the relative scale of affordability constraints and other indicators of high demand. The greater the improvement in affordability needed, the larger should be the additional supply response; 3 Plan makers should not attempt to estimate the precise impact of an increase in housing supply; 4 They should increase planned supply by an amount that, on reasonable assumptions and consistent with principles of sustainable development, could be expected to improve affordability; 5 They should then monitor the response of the market over the plan period.
3.39 On the most simple basis, applying the scale of uplifts identified as required to address affordability at the national level of between 20.9% and 44.2% would indicate a housing supply requirement of between 697 and 832 dpa in Guildford (based on addendum's demographic-led need of 577 dpa). Naturally, such an approach assumes other Local Plans would also make appropriate adjustments for their market signals in accordance with Government policy's 3-40 However, it is also clear that we need to look at the circumstances of Guildford in identifying an appropriate scale of uplift, given the greater problems of affordability in that district. We have therefore looked at a range of alternative approaches at the local level, and then draw these together to arrive at a conclusion as to the appropriate uplift.

1. OBR house price forecast and University of Reading model

3.41 The Office for Budget Responsibility (OBR) produced Working paper No.6 Forecasting house prices in July 2014. The report identifies the following with regards to future average earnings growth and median house price growth (the components of an affordability ratio) in paragraph 3.42:

"Using some long-run assumptions for real income growth (2.2 per cent a year, including growth in the number of households of 1 per cent a year) and housing supply (keeping pace with the number of households), and assuming the housing discount rate and wage share variable are stationary, the model predicts around 3.3 per cent real house price growth a year in steady state. In addition, assuming consumer price inflation in line with the Bank of England's 2 per cent target implies 5.3 per cent a year nominal house price growth in steady state."

3.42 The University of Reading's affordability model, as set out previously, found a high price elasticity (-2.0) in relation to increases in stock at regional level in England, implying in effect that for every 1% increase in supply, relative prices would be expected to fall by 2%. 3.43 There has been some degree of economic change since July 2014. OBR's March 2017 economic outlook would indicate average house price growth of 4.80% per annum and peak average wage growth of 3.7% per annum over the period to 2022 (the horizon of OBR's economic outlook). Although different in absolute terms to its July 2014 assumptions, the difference between wage and house price growth is the same, i.e. the affordability outcomes under the same assumed rate of housing growth will be the same whether using OBR's July 2014 or March 2017 assumptions.

3.44 Based on the above reports, the District would need to deliver 873 dpa on average over the period 2015-34 to maintain affordability at its current level (12.2) to 2022 (the horizon of OBR's economic forecast), or 987 dpa to maintain affordability at its current level to 2034 (the end of the plan period). This should be seen in the context that affordability within the projection period has already worsened, from 10.9 in 2015 to 12.2 in 2016. Evidently to return affordability to the level seen at the start of the plan period and even greater uplift would be needed. Lichfields' analysis shows that 1,224 dpa would be needed to bring affordability back to the 2015 level by 2034. 3.45 Even then, it should be noted the above modelling assumes a price elasticity of -2.0 which could be seen as cautious. Recent research by generis indicates that at a Local Authority level a price elasticity of -1.0 is more appropriate (1% increase in supply brings about 1% fall in price) and better reflects factors at the local authority level (paras 4.19-4.22). However, this would involve taking a different view to the OBR position.

2. Guildford weighted apportionment of national needs

3.46 Guildford is relatively worse in respect of affordability than the national equivalent, with a lower quartile affordability ratio of 12.2 compared with 7.2 nationally. All other things being equal, to improve affordability across the country, Guildford, and its housing market area peers, would need to make a proportionately greater uplift than those where affordability issues are less acute. If we accept the national position set out above - that the minimum national level of delivery required is c.250,000 dpa (e.g. as in the July 2016 House of Lords Select Committee report - see paragraph 81) - then this would imply a 35,000 dwelling uplift above the 2012-based and 2014-based household projections (both at c.215k dpa). We can then consider how this required uplift should be shared between 320+ Local Planning Authorities across the country in order to seek to hold the affordability ratio (at least at a national level) constant. In doing so, we broadly adopt a localised version of the approach adopted by the NHPAU as summarised in Appendix 1.

[7 Why supply matters: the elasticity of house prices at a local level (January 2016) Regeneris Consultinghttps://drive.google.com/file/d/oB3JZDh2pahPaVJncono2dUg2Tk0/view]
3.47 We have modelled three alternative scenarios for market signals uplifts across the country, with outcomes as follows:

1. Each district with an affordability ratio above the national ratio makes a market signals uplift in proportion to its difference with the national figure - this would see Guildford would address 0.6% or 209 dpa equivalent to a 36% uplift on the addendum demographic led need of S77 dpa;
2. Each district with an affordability ratio above the national ratio makes a market signals uplift in proportion to its difference with the national figure (weighted so%) and its projected household growth (weighted so%) - this would see Guildford address 134 dpa, equivalent to a 23% uplift; and
3. Every district (whether above or below the national ratio) makes a market signals uplift in proportion to its difference with the lowest affordability ratio, Copeland at 2.6, (weighted so%) and its projected household growth (weighted so%) - this would see Guildford address ns dpa, equivalent to a 20% uplift.

3.48 Given a) is simply weighted by the affordability ratio, and takes no account of the baseline scale of growth anticipated in the district, it is considered that using the approach indicated at b) and c) would better reflect the scale of uplift that, when adopted in LP As across the country, could provide sufficient housing to hold the affordability ratio steady in each location. This would suggest an uplift of between 20% and 36% for Guildford.

3. Benchmarking stock increases

Guildford has historically delivered very modest growth in its stock of homes in comparison to other authorities in the South and East of England. It is notable that Guildford, with completions at around 0.48% of stock annually over the period 2001-2016, is below the majority of other areas. Even at the proposed housing requirement, of 654 dwellings per annum, this would reflect growth of c.1.04% per annum, below what many other areas have achieved, even during a period including recession. [Figure 2]

3.50 As illustrated in Figure 2, areas including, Milton Keynes, Swindon and Dartford have all delivered new housing at a rate of up to 1.5% of stock per annum (and in some cases, more if looking at the period pre-recession), and see generally lower affordability ratios. On a comparative basis, this analysis demonstrates that, all else being equal, a greater growth rate in housing stock could help to moderate affordability pressures (albeit clearly it is not the only factor).

3.51 If Guildford were to increase rates of delivery to 1.2%-1.4% of stock per annum, as seen in numerous locations elsewhere, this would be equivalent to a delivery rate of 767-912 (against a 2016 dwelling stock of 57,640 as per CLG Live Table 125). At the lower end this represents an uplift of 33% on the addendum's demographic led needs of 577 dpa and could be seen to be a level of stock increase which could reasonably be expected to moderate increases in affordability to levels seen in those more affordable comparator locations where housing stock has been growing at such a rate.

4. Benchmarking market signal uplifts elsewhere

As set out in Lichfields' previous review, it is considered that benchmarking Guildford against market signal uplifts applied elsewhere in the Country is a relevant and helpful indicator of the scale of market signals uplift considered reasonable against the PPG. At Appendix 3 we set out a table of where Market Signal uplifts are being applied either through current SHMAs or in Inspector's findings on Local Plans. Whilst the position is varied, it does on a general basis confirm two principles:

[Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

No substantive changes are proposed to this site allocation other than the deletion of the reference to avoiding development in Flood Zone 2 - this change reflects a factual error and confirms that no part of the A7 site lies with this zone.

However, we note that our other comments on the 2016 PSLP (attached at Annexe 1) have not been taken on board and we remain of the view that these amendments to Policy A7 are necessary to render the policy sound.

Thus, we consider therefore that Policy A7 should be amended to more closely align with the residential capacity potential of this site (i.e. 450 dwellings, rather than 350) and to reflect the ability for the whole of that housing to be delivered in the 'first five years' of the plan (i.e. 2019/20 to 2023/24, rather than the 6-10 years phase).

We also consider that the 'Allocation bullets' be amended to read:

- Improved transport and interchange facilities,
- Approximately 450 homes (C3),
- Additional retail (convenience and comparison) and food and drink offer, and
- Additional complementary offices and assemble & leisure uses.

Finally, we consider that the soundness of Policy A7 also requires the 'Opportunities' section to explain that the improvement of the station infrastructure at Guildford Station, consistent with the Infrastructure Schedule contained at PSLP Appendix C which specifically includes "Guildford rail station capacity and interchange improvements ... [to be] Network Rail and developer funded". Those improvements proposed and funded by SRG, if approved, will be delivered in the first five years, so the time period should be amended to "between 2019 and post 2034" Where such transport and interchange improvements are to be funded through commercial redevelopment, the viability of such development will be affected as a consequence.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

We also consider that the 'Allocation bullets' be amended to read:

- Improved transport and interchange facilities,
- Approximately 450 homes (C3),
- Additional retail (convenience and comparison) and food and drink offer.
- Additional complementary offices and assemble & leisure uses.

Attached documents:

Comment ID: pslp171/1211  Respondent: 11716417 / Solum Regeneration (Solum Regeneration)  Agent: Nathaniel Lichfield & Partners (Dennis Pope)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Previously this policy in the 2016 PSLP stated:
"New residential development is required to make the most efficient use of land whilst responding to local character, context and distinctiveness. Residential densities will vary dependent upon the local area context and character and the sustainability of the location. Higher density development will be supported in Guildford town centre."

Policy H1 in the 2017 PSLP has, however, removed the above text.

As a consequence, the preamble which previously made reference to the need to use natural resources, such as land wisely, and which recognised that the efficient use of land is "essential", has also been removed.

It is unclear what the justification is for removing this policy guidance given that making effective use of land, particularly that which is previously-developed, is entirely consistent with the NPPF (paragraph 17). Similarly, the removal of this policy guidance is at odds with the priority (stated in the Spatial Vision) to direct new residential to existing brownfield sites by making best use of previously-developed land in order to avoid the use of greenfield sites.

If GBC is serious about these objectives, this policy guidance should be re-instated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1212  Respondent: 11716417 / Solum Regeneration (Solum Regeneration)  Agent: Nathaniel Lichfield & Partners (Dennis Pope)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H2: Affordable Homes

The 2017 PSLP Policy H2 remains inconsistent with the NPPF and is unsound because the policy itself does not expressly deal with development viability and deliverability, notwithstanding this is addressed within the reasoned justification to the policy (at paras 4.2.34 to 4.2.44).

The latter (4.2.40) recognises that there may be some circumstances where abnormal costs would make scheme delivery unviable and that, where developers demonstrate to the Council's satisfaction that providing the amount of affordable housing required by this policy would not be economically viable, they will accept a reduction in the overall number of affordable homes.

The draft policy continues to rely upon the 2011 Planning Obligations SPD which indicates that, where it is not viable for a development to meet all the requirements of this SPD (i.e. including affordable housing), a flexible approach will be taken by the Council. We consider the approach to be taken where proposed developments- for whatever reason- are found to be unable to support affordable housing at the prescribed 40% level, should be addressed in the policy itself, given the deliverability requirement of the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1210  Respondent: 11716417 / Solum Regeneration (Solum Regeneration)  Agent: Nathaniel Lichfield & Partners (Dennis Pope)
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Policy S2: Borough Wide Strategy**

Policy S2 sets out the proposed annual housing target. It is proposed that this is reduced from 13,860 dwellings over a plan period 2013-2033 (693 dwellings per annum) to 12,426 dwellings over a plan period 2015-2034 (654 dwellings per annum). This is substantively based on new evidence the GBC has brought forward in respect of the Borough's objectively assessed need (OAN) for housing.

However, it is considered the proposed plan housing requirement in Policy S2 is not 'sound' as it is not positively prepared (being based on a strategy which seeks to meet actual objectively assessed housing needs) and not justified (being based on evidence which is not robust).

We have reviewed the two main documents which form the evidence base for the Council's housing requirement in the Plan; the West Surrey Strategic Housing Market Assessment (SHMA) (2015) and the Guildford Addendum (2017). Our review of these documents (appended at Annexe 2 to these representations) demonstrates that:

1. By selectively updating the evidence base for Guildford when it forms part of a wider housing market area (HMA), the assessment raises inevitable issues of consistency within different parts of the HMA, as it draws upon different demographic and economic assumptions in assessing housing need. In this context, it is important to note that no evidence is put forward in the Guildford Addendum to demonstrate that its new, lower OAN figure will not have an impact on the rest of the HMA; and

2. The SHMA and its Addendum do not reflect the guidance set out in the PPG, particularly with regard to market signals and the likelihood of any uplift improving affordability. The Waverley Local Plan Inspector has recently established that uplift for headship rates (as put forward in the SHMA and addendum) is insufficient, and our analysis shows that an uplift which brings the OAN to a level of circa. 700-750 dwellings per annum is both realistic (in terms of growth rates achieved in comparable areas) and could be expected to improve affordability. It would also help to increase the supply of affordable housing. Once the need for student accommodation is factored in, the full OAN would amount to c.725-775 dpa.

For the above reasons, we consider that draft policy S2 is unsound because the OAN figure used (and subsequent housing requirement in the PSLP, which seeks to meet the OAN) is not in fact the full OAN- is too low. In order to make the plan sound, an increase in the OAN/housing requirement is needed (to c.725-775 dwellings per annum) to ensure that OAN and plan housing requirement reflect the PPG and para 14 of the NPPF.

Furthermore, with respect to Policy S2, we have also reviewed the Land Availability Assessment (LAA) Addendum which has been published alongside the PSLP. The LAA Addendum contains the Council's current position on its five-year housing land supply and concludes it can only demonstrate 2.36 years supply. The shortfall is to be addressed through the adoption of urban sites which are currently allocated to later phases of the plan.
five years" (Footnote 11). This is especially relevant within Guildford Borough Council, where there is a very poor track record of approving major residential development schemes[1].

Excluding sites without planning permission the five-year housing land supply is argued to be a low as 1.47 years (based on our OAN of 775).

On the above basis, we consider that there is a 'serious and significant' shortfall in the Council's five year housing land supply. This should be explicitly addressed in Policy S2, which currently does not refer to expected housing supply with the first five years of the plan period. Accordingly, and alongside our concerns regarding the OAN/housing requirements, we consider that Policy S2 is unsound.

[1] Department of Communities and Local Government figures show that 47% of major residential applications were approved by GBC, compared to the average in England of 81%, in the year ending March 2017.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1209  Respondent: 11716417 / Solum Regeneration (Solum Regeneration) Agent: Nathaniel Lichfield & Partners (Dennis Pope)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Vision and objectives

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In defining a Spatial Vision for Guildford, in particular how best to meet housing need, regard should be given to the February 2017 Housing White Paper. The advice given to local authorities in the White Paper states that:

"... the Government asks local authorities to be as ambitious and innovative as possible to get homes built in their area. All local authorities should develop an up-to-date plan with their communities that meets their housing requirement (or, if that is not possible, to work with neighbouring authorities to ensure it is met), decide applications for development promptly and ensure the homes they have planned for are built out on time. It is crucial that local authorities hold up their end of the bargain. Where they are not making sufficient progress on producing or reviewing their plans, the Government will intervene. And where the number of homes being built is below expectations, the new housing delivery test will ensure that action is taken." (Executive Summary) (our emphasis)

It is evident therefore that local authorities should be "ambitious" in making a contribution to the need to increase housing delivery. However, the White Paper also recognises that local authorities should maintain "existing strong protections for the Green Belt, and clarifying that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements" but at the same time "making more land available for homes in the right places, by maximising the contribution from brownfield and surplus public land." (Step 1: List of Proposals)

Although the draft Spatial Vision confirms that the preferred location for new residential is on existing brownfield sites we note that only 3,000 dwellings (previously 2,800 dwellings in the 2016 PSLP) of the total 12,426 dwellings (previously 13,860 dwellings in the 2016 PSLP) required over the plan period up to 2034 are in the urban areas. This means that despite this stated objective 76% of the new residential is allocated outside of the urban areas. The significant majority of proposed
housing in Guildford will therefore not be able to take advantage of the existing infrastructure and services that are provided in urban area or help to reduce the need to travel and offer alternative modes of transport to the private car.

This remains inconsistent with the emphasis placed on encouraging the effective use of brownfield land contained in the NPPF (paras 17 and 111) and the encouragement given “to ‘boost significantly’ the delivery of housing (para 47).

We consider that significantly greater emphasis needs to be incorporated in the Vision to reflect the Government’s national policy imperative contained in the Housing White Paper as identified above. Whilst recognising the challenge of accommodating significant levels of housing within Guildford we would suggest that, as a matter of principle, the Vision should strongly encourage opportunities to maximise residential development within the Town Centre. This will help to ensure that the need to take ‘greenfield’ or Green Belt land is minimised.

We would suggest that this approach would more accurately and appropriately reflect Government green belt policy, which at paragraph 84 of the NPPF indicates that:

"When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary."

We consider that the Vision should be more strongly expressed to espouse this principle, rather than simply suggesting that existing brownfield sites are the "preferred location". We would therefore suggest, to ensure consistency with national policy and plan soundness, that the following text (underlined) should be added to the third paragraph of the Spatial Vision as follows:

"The plan provides for the delivery of 12,426 additional homes by 2034. As the preferred location for this development is on existing brownfield sites in the urban areas, in particular highly accessible locations within Guildford town centre, opportunities to maximise residential development and make best use of land in these locations must be taken. Over 3,000 units are proposed in the urban areas which take advantage of the existing infrastructure and services, reduce the need to travel and offer alternative modes of transport to the private car......"

In addition given the importance of the Guildford Railway Station within the town centre in terms of being a strategic development site which will improve station facilities, provide a new urban quarter and deliver a significant level of housing we would suggest that specific reference should be made to this site within the Spatial Vision text.

An additional sentence should be added to the text of the Spatial Vision after the paragraph that also deals with the North Street site to read:

"The redevelopment of the Guildford Railway Station site will deliver significant station improvements and assist in increasing station capacity, whilst making a major contribution to meeting housing need on a brownfield site in a highly sustainable location within the town centre."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Introduction
1. We act on behalf of The Co-operative Group (TCG) and have been instructed to submit the following representation to the Proposed Submission Local Plan: Strategy and Sites (June 2016).
2. As you will be aware TCG is the landowner of a site known as ‘Kernal Court, Walnut Tree Close’ (the Site). This Site is designated in the emerging Site Allocations as ‘Policy A13: Kernal Court, Walnut Tree Close, Guildford’. The extent of the Site is identified on the accompanying Site Plan.
3. This representation follows the representations submitted by TCG in both November 2013 and September 2014 to the Strategy and Site Issues and Options consultation and the Draft Local Plan consultation respectively.

Examination and Next Steps
We trust the above will assist in the formulation of the Local Plan and request that these recommendations are reflected within the submitted Local Plan. It is important to note that, as we are proposing changes to the Local Plan, we would like to express an interest in participating in the Local Plan Examination. In the meantime, we would be happy to discuss these representations in more detail with GBC Officers.

Please confirm receipt of this representation and keep us informed of the submission of the Local Plan for Examination. If you have any queries or require any further information please do not hesitate to contact Emma-Lisa Shiells or Mark Harris at this office.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7865  Respondent: 11731841 / Barton Willmore LLP (Emma-Lisa Shiells)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A13

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Part 2: Sites - Policy A13
As stated above, TCG is the owner of the Site allocated under Policy A13 for approximately 100 homes (Use Class C3) which has been the subject of pre-application discussions with your Officers for the redevelopment of the Site to provide residential and / student accommodation.

On behalf of TCG, we support the principle of the Policy which confirms the acceptability of the removal of the industrial use at the Site and the replacement with residential. However, we object to the land use intent of the Policy as we consider
that the allocation should not be solely for residential use. The Site should instead be allocated for residential (Use Class C3) and / student accommodation (Sui Generis).

Student accommodation is considered to be an entirely appropriate use given the Site’s proximity to the Railway Station, the Town Centre and in particular it’s easy walking distance to the University Campus. The Site’s constraints (in terms of access, irregular shape not lending itself well for employment use), the Site’s surrounding uses (including student accommodation adjacent to the Site), the nature of the forthcoming uses and the transition occurring in the area also underline its suitability for both residential and student accommodation. This is recognised within supporting text of Policy A13 which highlights the changing character in the area from primarily industrial to residential (including student accommodation).

TCG has considered their options for the Site and concluded that residential and / student accommodation also represents a deliverable and viable development opportunity and as such, seeks that Policy A13 is amended to include the allocation for residential (Use Class C3) and / student accommodation (Sui Generis).

It is important to reference Paragraph 4.2.7 of the emerging Local Plan which confirms that any additional student accommodation built over and above projected need will count towards the general housing requirement. As such the provision of student accommodation (regardless of whether it is meeting an identified need or not) will relieve pressure on the housing market in a location that is entirely appropriate for such a land-use.

Accordingly the emerging Local Plan should be updated to reflect these comments within Policy E3 and Policy A13.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17322  Respondent: 11731841 / Barton Willmore LLP (Emma-Lisa Shiells)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Representation
Part 1: Policy E3 - Employment Policy

Policy E3 of the emerging Local Plan considers employment capacity. This policy protects employment floorspace within the Borough, this includes Strategic Employment Sites, Locally Significant Employment Sites and existing employment sites that are not specifically allocated for employment use. This could potentially apply to the existing Site given the historic and present employment use which remains on part of the Site.

The Policy sets a requirement for a 12 month active and comprehensive marketing period for the current employment use of the site if it is proposed to change the use of the existing employment site. TCG objects to this Policy as it adds unnecessary barriers for the redevelopment of existing employment sites that are more suited for alternative uses.

Sites that are in an existing employment use, but allocated within the emerging Local Plan for an alternative use, should not be protected by this policy and subject to the requirement of a 12 month marketing period as the site allocation confirms the acceptability of the site for the alternative use. In this regard, the Evidence Base’s identification of the Site for alternative use should offer sufficient justification to override the submission of any further suitability evidence. As such, Policy E3 should be amended to exclude the marketing requirement for existing employment sites allocated for an alternative use.
within the Local Plan. The third bullet point of Policy E3 relating to employment floorspace outside designated employment sites should be reworded as follows (our additions):

‘Employment floorspace will be protected in line with latest needs assessment and the loss be resisted outside designated employment sites, unless the site is allocated for an alternative use. Change of use will only be acceptable if evidence is provided of active and comprehensive marketing of the site for its current use (offices, research and development or industrial) for a continuous period of at least 12 months. If the site is allocated for an alternative use within the Local Plan, the marketing period is not required’.

This is considered acceptable as it will deliver sites that have been allocated as suitable for alternative uses and required to deliver the overall plan strategy. It will also ensure the deliverability of the site allocation and the important contribution it makes towards the Plan’s residential targets.

The NPPF (Paragraph 22) highlights that planning policy should avoid the long term protection of sites for employment use where there is no reasonable prospect of the site being used for that purpose. Therefore to ensure the emerging Local Plan is consistent with National Policy in terms of being ‘sound’ (NPPF, Paragraph 182), flexibility should be applied to this policy to allow the release of employment sites where there is not considered to be a reasonable prospect of the Site being used for that purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4080  Respondent: 11741121 / University of Law  Agent: Lichfields (Victoria Barrett)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A33

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Guildford Borough Council Proposed Submission Local Plan: Strategy and Sites – Representations on behalf of the University of Law

On behalf of our client, the University of Law (the University), we enclose representations to Guildford Borough Council Proposed Submission Local Plan: Strategy and Sites consultation which has been issued for public consultation until 24 July 2017.

Background

The University is the UK’s longest established specialist provider of legal education and can trace its origins back to 1876. The University moved to Braboeuf Manor on the Old Portsmouth Road in 1964. The campus comprises teaching accommodation and the University’s main office functions. The site is currently in Use Class D1.

The Guildford campus has expanded since 1964 to provide additional on-site teaching accommodation. Approximately 700 students are currently educated at the Guildford campus and the University intends to increase the number of undergraduate places in law courses as well as introduce new degrees including business at both undergraduate and postgraduate level and law with criminology over the coming years. Accordingly, it is anticipated that the number of undergraduate and
international students at the University will increase over the coming years. Both cohorts expect universities to provide student accommodation.

At present all the University students live off-site. The University does not own its own accommodation but instead has an arrangement with a number of private landlords who are able to offer some accommodation i.e. rooms in a shared house. The quality, type, extent and location of accommodation available in Guildford does not adequately provide for the needs of the University and is severely hampering its ability to attract students and grow in the future. These issues are exacerbated by the high cost of living in Guildford and raising expectations of the standard of accommodation required by students across the UK. It is vitally important that the University students have access to quality accommodation on-campus in the future and therefore the University welcomes the site allocation for student accommodation in response to the submission to the Council’s Call for Sites in January 2015 (Annex 2).

Representations were submitted on behalf of the University to the Proposed Submission Local Plan in July 2016 which welcomed the proposed site allocation on its campus (Policy A33) and inset part of the site from the Green Belt; but raised concerns regarding the height constraints placed on the site allocation essentially limiting development to two storeys. We therefore welcome the revision of the site allocation wording to address these concerns and require future development to have “significant regard to height of buildings with specific regard to the setting of the Grade II listed Braboeuf Manor.” It is considered that this will provide the University with the flexibility to deliver a viable student accommodation scheme whilst ensuring it is appropriate within this sensitive site context.

However, we have further comments on the student numbers specified in the policy wording and site location. We expand on this below.

**Student Numbers**

By way of background, West Surrey Strategic Housing Market Assessment (2015) identifies that the number of students in the borough increased by 4,116 students between 2001 and 2011, of which 3,710 were full time students (excluding 16-17 year olds) equating to a 53% increase. Of this growth 1,329 students (32%) chose to live in halls of residents or other communal establishments, whereas 2,274 lived in the wider housing market area (55%). Students are therefore placing additional pressure on the housing market contributing to acute demand in housing and associated high rental costs for private rented accommodation. This is further exacerbated by the undersupply of housing recognised in the SHMA between 2001 and 2015 relative to the planned need of 419 dwellings per annum.

The provision of on-site student accommodation for the University would therefore contribute to alleviating this pressure on the housing market. Indeed, para. 4.2.18 of the Proposed Submission Local Plan states that “to minimise the pressure on the existing housing stock it is important that new accommodation is provided to meet any significant increase in full time Guildford-based students.”

Since the Proposed Submission Local Plan consultation, the wording of Policy A33 in relation to the University of Law site has been amended to specifically allocate the site for 112 student bedspaces. We understand that this number has been established based on the Council’s assumption on a reasonable level of development within the Area of Outstanding Natural Beauty (AONB), rather than an assessment of need. It does not appear to have been based upon a detailed assessment of what the site might be able to accommodate in design terms.

Nearly all undergraduate law course providers make accommodation available for first years and most have accommodation for international post-graduate students. In order for it to compete, the University must offer a similar provision. The University is anticipating a considerable expansion of student numbers over the coming years through the introduction of new courses. Based on current projections the total number of students at the campus is anticipated to rise from 713 to 948 students by 2021(see Annex 1), equating to a 33% increase in student numbers which would contribute to increased pressure on the local housing market. Of this, 108 will be undergraduate and international students who will expect on-site student accommodation (see Table 1). However this does not take account of the introduction of the new undergraduate business degree which the University expects to commence in the coming years. Based on the University’s student number predictions for this course, by 2021 there would be a bed space need of approximately 159 bedspaces to accommodate the first year business undergraduates. The allowance for a higher number of bedspaces is therefore necessary to support the expansion and growth of the University, particularly with regards to the introduction of the new undergraduate business degrees.
The proposed policy should be flexibly prepared to enable detailed site capacity to establish the level of development the site can accommodate in design terms for discussion with the Council at the planning application stage. This approach would be consistent with NPPF para. 14 which encourages local planning authorities to positively seek opportunities to meet the development needs of their area. Indeed, draft Policy H1(5) states that “purpose built student accommodation for full time higher education Guildford based students will be encouraged on campus locations where appropriate” (our emphasis added). It is considered that this will provide the Council with sufficient control over the quantum of development on the site with the onus on the applicant to demonstrate that any level of student accommodation proposed in a subsequent planning application is acceptable from a design perspective, particularly in terms of the impact on the AONB.

Furthermore, the University is concerned that limiting the number of bedspaces to 112 could have implications on the viability of future student accommodation schemes. Paragraph 173 of the NPPF identifies that careful attention should be paid to viability to ensure that plans are deliverable. Therefore sites should not be subject to such policy burdens that their ability to be developed viably is threatened. Given that the scheme is still emerging, it is considered that the site allocation should be flexible in its wording to ensure that a viable scheme can be established. The specification of 112 bedspaces in the allocation could be unreasonably restrictive on future development schemes and should be removed to allow and appropriate and justifiable level of accommodation to come forward that will meet future need.

Consequently, it is not considered necessary to identify a specific number of bedspaces within the site allocation itself. Accordingly, we suggest that the policy wording is returned to its previous iteration to state:

“The site is allocated for student accommodation (sui generis).”

Site Location

The site location map appended to the site allocation identifies the development as appropriate within the car park to the north west corner of the University Campus. This reflects the positioning of the most recent schemes for future student accommodation. Nevertheless, the scheme for student accommodation on site is still emerging. Accordingly, it is important that the site allocation is sufficiently flexible to allow potential changes to the scheme in future, including a slightly amended layout, if required. The proposals would be appropriately assessed as part of the planning application process in terms of ecological, visual and heritage impact. Consequently, it is considered that the site allocation map should include the whole campus as subject to the site allocation, in line with that submitted as part of the Call for Sites Form submitted in January 2015 (appended to this submission for reference).

Conclusion

The University has continued plans for expansion including the increase of undergraduate and postgraduate students and the provision of on-site accommodation is vitally importance to support this. Whilst the site allocation for student accommodation is strongly supported, the specification of 112 bedspaces raises considerable concern. Para. 4.2.18 identifies that new accommodation should be provided to meet significant increases in student numbers and it is considered that the site allocation in its current form will not enable the University to deliver this. Draft Policy H1(5) provides the Council with sufficient control on the quantum of the development through the planning application process to ensure acceptability. Similarly, the location of development would also be rigorously assessed as part of the planning application. Accordingly the proposed restrictions in the policy itself are unnecessary.
Land to the South of New Pond Road, Farncombe

The land to the South of New Pond Road was previously allocated for development via the Guildford Draft Local Plan Strategies and Sites document. The land covered by this previous allocation falls within different land ownerships. The western part of the allocation is being promoted by Countryside Properties (UK) Ltd. The eastern part of the allocation is being promoted by BlackOnyx Land Promotions Guildford Ltd. There are two residential properties within separate ownership at the centre of the previous allocation.

Countryside Properties and BlackOnyx are collaborating to bring forward the development of the land to the South of New Pond Road in a co-ordinated and comprehensive manner.

Although separate representations have been submitted, there is recognition of the need to take account of each other's proposals.

If the Borough Council are minded following the current round of consultation to reinstate the previous draft allocation at New Pond Road, we would confirm our intention to work together to ensure that the site is deliverable, ensuring that housing delivery through the plan-making process is achieved through a reliable supply of land for housing over the entirety of the plan period.

Countryside Properties and BlackOnyx will continue to co-operate in the delivery of the wider site and promote its identification as a residential allocation in the emerging Guildford Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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| We are pleased to see that a requirement of this policy is that the ‘design responds positively to the changing character of this area, whilst being sensitive to the corridor of the River Wey’. However, again the bullet points listed in opportunities should all be reflected as requirements of the redevelopment of the site. |

| In addition, the criteria listed above for Policy A9 would also be applicable to the redevelopment of other sites along the river frontage of Walnut Tree Close and therefore a more detailed set of design principles should be included with this and other site specific policies. |

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The same comments apply for this site as for A13. Specifically in both cases, as well as site A9, we note that no mention is made for the desire for these sites to include large areas of green space fronting the Navigations as part of a wider linear park that was original set out in the Town Centre Masterplan document. The concept of a new riverside community park was, and is, supported by the National Trust, particularly the benefits this could bring to enhancing the immediate setting of the Navigations and the opportunity it would provide for more people to access, appreciate and understand the historic significance of the Navigations. It is disappointing to see that such concepts and opportunities developed through the Town Centre Masterplan process are being lost through this iteration of the local plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Respondent: 11832961 / The National Trust - London and SE (Rachel Botcherby)</th>
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<td>This policy currently makes no reference to the fact that it is sited within the visual setting of the Navigations and the River Wey Conservation Area. The Trust has provided detailed comments separately on the proposed Clay Lane Link Road proposals that are already being progressed, including the current planning application. However, we are disappointed that no consideration has been drawn out in the policy to the need for new development to have regard to the impact on the wider setting of the Navigations from, inter alia, intrusive lighting, increased pollution, noise from vehicular traffic and intensity of use, visual intrusion (from the scale, height, and massing of new development), light pollution, increased risk of flooding and impact on the water table. Given the facilities intended to be delivered on this site allocation, we would suggest that the policy seeks a comprehensive phased approach to redevelopment in line with an approved Masterplan that delivers the priorities listed in the policy, including the additional considerations listed above in respect of the River Wey, alongside more detailed urban design principles as appropriate to the different elements of the site allocation.</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This is one of the largest site allocations proposed in the local plan, seeking deliver approximately 2000 homes, employment floorspace, local retail centre, new schools and community facilities, yet it is located within the greenbelt, includes an area of ancient woodland, and borders a Site of Nature Conservation Importance. The site also closely abuts the edge of the Grade II registered Clandon Park Historic Park and Garden. The importance of the landscape was principally recognised as an eighteenth century landscape park by Lancelot ‘Capability’ Brown, although the subsequent late nineteenth century gardens advised by William Andrews Nesfield are also noted.

Whilst the two sites are physically separated by the railway line, the scale, massing height and layout of the development on this site, including the desire for a new railway station, will need to have due regard to the neighbouring historic landscape and the impact on the setting of this valuable heritage asset.

We would also question the approach and detail of the policy wording given the scale of development envisaged. We are concerned at the limited inclusion of any urban design principles or considerations for such a strategic site allocation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7778  Respondent: 11832961 / The National Trust - London and SE (Rachel Botcherby)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As set out above, the National Trust is an important landowner within the Surrey Hills AONB and as an organisation we nationally support the ongoing protection and enhancement of the Country’s protected landscapes be they National Parks or AONBs.

We are therefore concerned about the proposed site allocation at Blackwell Farm which we understand was recommended in a recent Landscape Character Assessment to be included within the AONB in Natural England’s Surrey Hills AONB Boundary Review.

The site allocation will effectively extend the built of area of Guildford, highly visible from the A31 and new access road, having an impact on the setting of the AONB. We believe this allocation should be removed from the draft Local Plan until such time as the Natural England Boundary Review process has been concluded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
As set out in our previous consultation response, the National Trust objects to the proposal to remove the Law College / Mount Brown sites from the Green Belt to enable redevelopment. This site lies within the AONB / AGLV and within the St Catherine’s Conservation Area. This site is close to the River Wey and is highly visible heading downstream from Shalford to Guildford. The redevelopment of this site would have a potentially major impact on the amenity of the River Wey and the setting of the River Wey Conservation Area, the AONB, the St Catherine’s Conservation Area and the setting of the St Catherine’s Scheduled Ancient Monument. The site makes a significant contribution to the Green Belt and lying on the periphery of the urban area it is crucially important to ensure it remains essentially open in character. Its removal is therefore not in accordance with paragraph 85 of the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

This site also abuts the River Wey and Godalming Navigations Conservation Area yet no reference to the consideration of the Conservation Area is made in the policy which is again very disappointing. This part of the Navigations passes through medieval hay meadows, meads and flood plain. It is characterised by its openness and is therefore highly susceptible to a change in character resulting from the redevelopment of this site.

The Trust will seek the preservation and enhancement of important views out of and into Navigations, as well as the preservation and enhancement of the strong sense of openness, natural landscape character and waterway atmosphere at this point along the Navigations.

The draft policy should be updated to address the following considerations:

- The height and scale of new buildings on this site must have regard to the visual setting of the Navigations;
- New buildings must be well set-back from the Navigations, unless historical precedent dictates otherwise;
- New parking and loading areas must not be located adjacent to the Navigations;
- The planting screen between any new development and the Navigations must be strengthened and managed for the long term;
- New building materials and colours must be visually compatible with the rural character of the Navigations;
• New elevations facing the Navigations must be well-articulated, varied in design and respect the site’s historical associations with the Navigations;
• Lighting must not overspill into the waterway environment;
• The existing footpath alongside the Navigations must be retained and surfacing improved to provide improved access for all along the river frontage;
• New development must not result in an increased risk of flooding or an adverse impact on the water table or destabilise the banks of the Navigations.

We wish to continue to be consulted on planning applications on these sites and any others affecting the River Wey.

In respect of All Sites along the Navigations the National Trust will continue to seek to ensure there is:

• a consistency and cohesive design of riverside landscaping, including materials, signage, street furniture and fencing;
• detailed consideration of appropriate materials and surface treatment of the public realm, particularly the towpath, reflecting the historic character of that part of the Navigations to avoid over urbanisation;
• well maintained and visually attractive boundary structures;
• the removal/ avoidance of any visual intrusion into the Navigations from car parking and loading areas;
• no building of structures, whether temporary or permanent, which could de-stabilise the banks of the Navigations;
• appropriate lighting which does not overspill into the waterway environment urbanising the character of the area;
• Opportunities for protection and enhancement of nature conservation along the riverside.

As set out at the start of this letter, we have again appended a copy of the Trust’s ‘Principles for development affecting the River Wey Corridor in Guildford Town Centre’ which we would urge the Council to formally endorse in Local Plan policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7780  Respondent: 11832961 / The National Trust - London and SE (Rachel Botcherby)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We note that this site allocation has been significantly reduced in area from the previous consultation document which is a positive step forward and welcomed by the National Trust, however, the area to the north is largely green field and open, falling within the setting of the River Wey Navigations.

The Trust will therefore continue to ensure that the special character of the landscape and views are protected or improved in line with Policy G11 of the Local Plan. We therefore request that the ‘requirements’ for the redevelopment of the site are updated to not just require a ‘sensitive design, siting and form of development, given the edge of village/semi-rural location’ but also that the design has due regard to the setting and amenity of the River Wey and the Conservation Area.

We wish to continue to be consulted on future versions of this document and any planning applications on the sites discussed above, or any others, affecting National Trust land and property.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7769  Respondent: 11832961 / The National Trust - London and SE (Rachel Botcherby)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In addition to the requirements listed in the draft policy, the Trust would expect the policy to require the scale and design of any new buildings on this site to have regard to the setting of the River Wey Corridor and we request the policy be amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7770  Respondent: 11832961 / The National Trust - London and SE (Rachel Botcherby)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As set out above, the ‘opportunities’ listed under this policy really should be ‘requirements’ of any redevelopment of this site. All development on this site must have particular regard to the corridor of the River Wey Conservation Area. Particularly with regard to scale, height and massing of new buildings in juxtaposition with the neighbouring historic Billings Warehouse buildings which provide the back drop to the Navigations.

The Station has been identified as a major gateway to Guildford within the Town Centre Masterplan, with plans already being progressed for new development options. The draft Masterplan document acknowledges that proposals in the river corridor, Station and around Bedford Wharf and North Street will require a clear rationale in relation to building heights, as these sites are highly visible not only from within the Navigations but also across the Navigations from other historic viewpoints. This should be made clear within the site allocations for the station sites.

The National Trust has commented separately on the current proposals for the station (under planning application reference 14/P/02168) and remains concerned regarding the scale and massing of the proposed buildings in relation to the existing
three storey buildings (The Billings Warehouse complex) which face the Navigations and which define the visual setting of
the Conservation Area. The transition in building heights between the proposed development sites and those existing
buildings which at present define the visual setting and context to the Wey Navigation Conservation Area needs further
consideration and this draft policy provides the opportunity for the Council to clarify this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPS16/7771  Respondent:  11832961 / The National Trust - London and SE (Rachel Botcherby)
Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Although on the other side of the railway station, the land levels are such that the scale and massing of new development on
this site must also have regard to the impact upon the corridor of the River Wey Conservation Area, as set out above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPS16/7772  Respondent:  11832961 / The National Trust - London and SE (Rachel Botcherby)
Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This site abuts the River Wey, towards Dapdune Wharf on the opposite banks of the River. The ‘opportunities’ listed
should all form fundamental ‘requirements’ of the policy. In addition to bullet point 3 under ‘opportunities’, more detail on
design principles should be included to guide the redevelopment of this site to ensure no adverse impact upon the
Conservation Area and setting of the River Wey.

The Trust would seek the following points to be reflected in the policy in respect of the redevelopment of this site:

- Proposals for any increase in building height on existing developed sites adjacent to the Navigations or within the
visual setting of the Navigations will be resisted – at this point in the river the character is beginning to become
more open and less built up.
- Proposals which bring buildings or other structures closer to the Navigations (unless historical precedent dictates
otherwise) will be resisted.
• The redevelopment should deliver increased screening of moving vehicles, parking, loading areas and access roads from the Navigations.
• Proposals for development which are likely to result in an increased risk of flooding or an adverse impact on the water table will be resisted.
• The redevelopment should seek to ensure that existing riverside trees are maintained.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17216  Respondent: 11832961 / The National Trust - London and SE (Rachel Botcherby)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The National Trust fully supports this policy. However since this is the key policy dealing with design in the plan we suggest that the wording of the first and fifth bullet points in the last section is amended to:

All developments will

• respond meaningfully and sensitively to the site, its characteristics and constraints, and the layout, grain, massing and height of surrounding buildings taking into account the context in which they are sited.
• Be expected to use art, materials and landscaping of a nature appropriate to their setting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17219  Respondent: 11832961 / The National Trust - London and SE (Rachel Botcherby)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We support this policy. In terms of detailed policies for the protection and enhancement of the historic environment we understand that these will be prepared as part of the ‘Development Management Policies’ document and we look forward to contributing to this, particularly regarding continued protection for the Corridor of the River Wey, which we believe is a useful and important policy. We also look forward to assisting with the preparation of any Conservation Area Appraisals that the Council is undertaking which include or affect National Trust property, such as the River Wey, West and East Clandon and West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17220  Respondent: 11832961 / The National Trust - London and SE (Rachel Botcherby)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As highlighted within draft Policy D1, we consider that it is fundamental to include appropriate landscaping within the design criteria of this policy. We too often see developments adjoining areas of protected or historic countryside whereby great attention has been paid to the scale, form, massing and materials of new buildings but when the development is implemented a completely inappropriate landscaping scheme is approved (often involving inappropriate planting species completely at odds with the adjoining landscape) which undoes the hard work undertaken in respect of built form as the urbanising impact from inappropriate landscaping, in some cases, can be just as stark.

We would strongly request that the first bullet point of the policy is updated as follows:

Ensures that the layout, scale, form, massing, height of buildings and structures, materials and landscaping relate to the site context and its surroundings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17213  Respondent: 11832961 / The National Trust - London and SE (Rachel Botcherby)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
As a major operator of heritage visitor attractions in the Borough, the National Trust is fully supportive of this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17215  Respondent: 11832961 / The National Trust - London and SE (Rachel Botcherby)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Vision 2015

We support the draft Vision for the town centre and Policy E7. As owners of the river bed and majority of towpath (but not adjoining land) and as the navigation authority we believe there is great potential to enhance the visual, amenity, historic and nature conservation value of the riverside and to integrate it more fully within the town centre. The implementation of this policy needs to be carried through in the development of proposals, and the determination of applications, for key town centre sites.

We note the Borough will continue to work on its Town Centre Masterplan document and the National Trust, as a key stakeholder, look forward to working with the Council in contributing to this document.

The Trust has prepared ‘Principles for development affecting the River Wey Corridor in Guildford Town Centre’ which consists of 10 bullet points. These were attached to our previous representations and are appended to this letter. We believe that, in line with the emphasis in the Plan on protecting and enhancing the historic environment (Policy D3), on Green and Blue Infrastructure (Policy I4) and because of the importance of the Navigations within the Town Centre, the Council should consider endorsing these key principles and append them to the Town Centre Policy or add them in the supporting text. Site specific considerations for each site allocation have also been highlighted for inclusion in various policies below. The National Trust considers these principles fundamental to the protection of the setting of the River Wey Conservation Area within the town centre.

All land and buildings owned by the National Trust in the centre of Guildford has been declared inalienable under the National Trust Act of 1907 and enjoy special protection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17222  Respondent: 11832961 / The National Trust - London and SE (Rachel Botcherby)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4
We support this policy in principle and the Trust welcomes the specific reference to the River Wey and our planning guidelines in the supporting text. However, the Trust’s main focus is less about the type of development, residential or commercial, but that any development is mindful of and respects the historic character of the river corridor in terms of scale, design, materials, lighting, location and impact on the water table and the structural integrity of the Navigations.

We note from Appendix E that the Council are proposing that the adoption of Policy I4 will supersede Policy G11 relating specifically to the River Wey and the Guildford and Godalming Navigations. The National Trust object to this approach and will strongly resist the loss of Policy G11.

We request that either Policy I4 is updated to include the National Trusts Planning Guidelines or the policy considerations listed in the current Local Plan Policy G11, namely that:

“Development within the River Wey Navigations corridor, as defined on the Proposals Map, will be permitted provided that:

• It protects or improves the special character of the River Wey and the Guildford and Godalming Navigations, in particular their visual, setting, amenities, ecological value, architectural and historic interest;
• The special character of the landscape and townscape in the corridor is protected or improved;
• Views both within and from the corridor which contribute to this special character are protected or improved;
• Where appropriate, public access is provided to and along the River and the Navigations.
• The Nature Conservation value of the site is protected or improved”.

Alternatively, reference to Policy G11 being superseded is removed from Appendix E, leaving Policy G11 in place and extant, until such time as the Council commence work on its Development Management Policies Document. The Trust would be happy to work with the Council to ensure that a suitably worded River Wey Navigations specific policy is included in this document to ensure its long term protection and enhancement as a key heritage asset not just to Guildford but also reflecting its national significance as one of the earliest waterways to be made navigable which, when combined with the Godalming Navigation, currently forms the most southerly operational navigations of the inland waterway network in Britain.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/17210</th>
<th>Respondent: 11832961 / The National Trust - London and SE (Rachel Botcherby)</th>
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<td>Agent:</td>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P1</td>
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</tbody>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The National Trust own and manage approximately 3932.71 ha of land designated within the Surrey Hills AONB. The distinctive character and natural beauty of Areas of Outstanding Natural Beauty (AONBs) make them some of the most special and loved places in England, which is why the National Trust will continue to champion for the ongoing protection and enhancement of the Countries protected landscapes.

The NPPF (Paragraph 115) makes it clear that “Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty”.

The landscape and natural environment of Guildford is one of its greatest assets which should be protected and enhanced through local plan policy. We are concerned about the wording of Policy P1 and the strength of protection such wording will deliver in practice. No specific mention has been made to the ‘Great Weight’ that government policy requires, which we consider needs to be made explicit in any Local Plan policy.

We do not consider that the criteria set out in the draft policy are particularly robust and consider that the policy could be reworded to more closely reflect the policies in the AONB Management Plan and deliver a more consistent policy approach to that taken within neighbouring authorities with adopted local plan policies, who also manage development within the AONB/AGLV.

Activities and developments outside the boundaries of AONBs that have an impact within the designated area are also covered by the statutory ‘duty of regard’, therefore, the draft policy should be amended to make it explicit that development that would adversely impact the setting of the AONB, through either harm to public views into and from the AONB or by some other impact, will not be permitted.

Whilst we acknowledge that Natural England are to undertake a review of the AONB boundary, much of the Areas of Great Landscape Value (AGLV) are identified as Surrey AONB Candidate Areas, therefore, the same policy principles should apply to AGLV as to AONB until such time as the review has been undertaken. Areas of Great landscape Value are an incredibly important buffer to the AONB as well as having their own high quality landscape character and the National Trust do not wish to see such protections undermined.

See additional comments below in relation to Policy A26 Blackwell Farm, Hogs Back, Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
development should be distributed due regard should be given to the retention of the Green Belt to ensure that communities remain separated and to prioritise the re-use of brown field over green field sites.

Settlement Boundaries

West Horsley

As stated in our previous representations to the Local Plan we object to the removal of West Horsley (south) from the Green Belt. West Horsley is smaller in scale, and very different in form and character from East Horsley and its rural nature and proximity to Hatchlands Park are such that we believe it should be retained within the Green Belt. A future aspiration should be to extend northward the current boundary of the Surrey Hills AONB to wash over Clandon, Hatchlands, West and East Horsley.

Send

We object to the removal of the village of Send from the Green Belt. The scale, form and open, rural character of the village is such that it makes a significant contribution to the openness of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17209  Respondent: 11832961 / The National Trust - London and SE (Rachel Botcherby)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We understand that the NPPF is underpinned by a presumption in favour of sustainable development and we note that Policy S1 largely replicates that set out in the NPPF. However, we believe that the policy, as currently worded, fails to include a fundamental part of the NPPF policy, namely Footnote 9, and we would urge the Council to amend the latter part of the policy accordingly.

Paragraph 14 of the NPPF makes it clear that for both plan making and decision taking, where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:

- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
- specific policies in this Framework indicate development should be restricted.

In practice this means that, where the development plan is unsatisfactory, planning authorities in areas such as, inter alia, AONBs or Green Belt should apply the NPPF policies on AONBs or Green Belt rather than simply apply the sustainable development principles of the NPPF.

Paragraph 14 of the NPPF with its Footnote 9 in effect transfers the starting point for assessment of planning applications in an AONB for example to paragraphs 115 and (if appropriate) 116. Therefore, for the Local Plan to leave out Footnote 9 (or their own version of it, providing it includes all the areas of constraint listed in the NPPF as a minimum) misleads the
decision maker into applying the presumption in favour of development when in fact in some cases, as set out above, such a presumption wouldn’t automatically apply.

Furthermore in relation to the above, we would question whether the Council have understood and had regard to the provisions of Paragraph 14 (and Footnote 9) of the NPPF in the process of developing this local plan. We are not convinced that sufficient justification has been provided for the unsustainably high levels of development proposed for the Borough. It would appear that sites have been allocated in the plan to deliver as a minimum the objectively assessed development figures that have been calculated, without any consideration of Paragraph 14 which requires the Council to plan for objectively assessed need unless specific policies in this Framework indicate development should be restricted (such as, inter alia, AONB, Green Belt, SSSI and areas at risk of flooding). With a significant proportion of the Borough subject to restrictive national planning policies, Paragraph 14 of the NPPF justifies the Council not meeting its objectively assessed development needs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/17208</th>
<th>Respondent: 11832961 / The National Trust - London and SE (Rachel Botcherby)</th>
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<td>Agent:</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The National Trust is pleased to comment on the draft submission version of the new Local Plan. As you are aware we own and manage several properties within the Borough including the River Wey and Godalming Navigations, Shalford Mill, Clandon House and Garden, Hatchlands and land at Netley Park, Little Kingswood and Hackhurst Down. These properties are of significant historic, economic, social, environmental, and amenity value.

The National Trust has a statutory obligation to ‘permanently protect places of natural beauty or historic interest for the benefit of the nation’. Therefore, any proposals which affect or could affect the River Wey and Godalming Navigations, Shalford Mill, Clandon House and Garden, Hatchlands and land at Netley Park, Little Kingswood and Hackhurst Down will need to have regard to these statutory obligations.

The National Trust has championed a strong, effective land use planning system in England since the 1920s. We strongly believe that planning exists to serve the public’s present and future interests. A robust system is the best way to guide good development to the right place and to ensure that poorly designed proposals and those in the wrong location don’t get built. We believe that good planning is an essential tool for balancing a variety of land use interests in the pursuit of an overriding public one and for ensuring sustainable futures for the nation’s special places.

VISION

Overall we support the Vision for the future of the borough, however, we consider that the Vision should place greater emphasis on building on, and protecting, the historic, cultural and environmental assets that make Guildford special. Whilst mention is made to the need for all new development in the town centre to respect and enhance the unique setting and historical character of the town, no mention is given to the wider historical assets in the borough, which together with other environmental assets are in large part, the foundation of its success. There is great potential to enhance these assets, not only for the amenity, environmental and cultural benefits this would provide, but also for the economic and social benefits that this would bring. The plan does indicate in some of the strategic objectives that the Borough now intends to take such
an approach to protect and enhance heritage assets and designated areas, as well as improve the quality of the built and natural environment and we welcome this, but the intent is not always followed through in terms of detail and, for example, site allocations and proposed settlement boundaries. We believe that protecting and enhancing the environmental, historic and cultural assets of the Borough should be made explicit as a fundamental part of the Vision statement, not just within the Strategic Objectives.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/1111  **Respondent:** 11847233 / Wisley Property Investments Ltd (Mike Murray)  
**Agent:** Savills (Charles Collins)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (Yes), is Legally Compliant? (Yes)

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please see attached representations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 160715 Local Plan Reps - July 2016 and Appendices.pdf (11.0 MB)

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**Comment ID:** pslp172/2710  **Respondent:** 11847233 / Wisley Property Investments Ltd (Mike Murray)  
**Agent:** Savills (Jim Beavan)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (Yes), is Legally Compliant? (Yes)

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please see the attached representation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Please see the attached representation.

Attached documents: Reg 19 GBLP Representations Wisley Property Investments July 2017.pdf (17.6 MB)

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**Comment ID:** PSLPS16/5580  **Respondent:** 11941665 / Debra Hurdle  
**Agent:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object – The proposal to build more housing on the Clockbarn site will only add to the traffic problems in this very narrow single track lane with Tannery Lane with dangerous junctions at both ends. There is already planning permission for 63 houses to be built next to Tannery House!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5579  Respondent: 11941665 / Debra Hurdle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object – The proposal at Garlick’s Arch was a surprise additional site, included only 13 days before the Borough Council met to recommend consultation? The original site at Burnt Common was for only 100 houses, this new development would have 400 houses plus industrial facilities! I have already pointed out that the roads are congested in Send so how will they copy with even more traffic from such a large development.

The new Send Primary School I understand is already to capacity and the Villages Medical Centre currently cannot take on any more patients so where is the proposed infrastructure for these proposals?

As stated before this is Green Belt land with ancient woodland and should be protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5582  Respondent: 11941665 / Debra Hurdle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
**I object** – This land in Send Hill is another Green Belt site and this wildlife area should be protected and not developed. It is also off a lane which is single track in places and it has a very dangerous junction at one end.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/11038  **Respondent:** 11941665 / Debra Hurdle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**I object** – Having visited a friend whose house and garden overlooked our beautiful countryside, I was shocked and dismayed to hear that the Guildford Local Plan included a site to build houses on the adjacent field! I am therefore concerned that it is possible to find ‘special circumstances’ to justify building on protected Green Belt areas and especially in Send?

I am very concerned about the proposed ‘in-setting’ of Send which will mean that the green areas within our rural village will become much more vulnerable to development as they no longer have Green Belt protection? The green areas within Send characterise the rural aspect of the village and to develop them could spoil it!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/11036  **Respondent:** 11941665 / Debra Hurdle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**I object** – When our children were at secondary school (George Abbot School) there was often a real problem getting them to school in the morning due to heavy traffic. At peak times Send Road (A247) and the A3 are often congested and sometimes completely gridlocked due to roadworks or simply the sheer amount of traffic.

It should be noted that as well as being a cut through for those who want to access the A3 and M25 from Woking, Send is also the cut through to Woking particularly the station in the other direction. The mini roundabout at one end of Send at Old Woking really does struggle to cope with the traffic going both ways!
It is proposed that just five sites (A25 A35 A42 A43 A44) will provide nearly half of Guildford’s new homes – these sites are in Burpham, Clandon, Send, Lovelace and Horsleys. I am therefore very concerned about how a road system already under such pressure can cope with any more traffic resulting from all these new homes?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/11037  **Respondent:** 11941665 / Debra Hurdle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object – The housing number has been calculated at 693 houses required each year for 15 years. I am concerned about the accuracy of this calculation and whether it is unnecessarily inflated and the number of houses required to be built should be much less? I therefore challenge the number.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp172/3373  **Respondent:** 11941665 / Debra Hurdle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY A42 Clockbarn Nursery, Tannery Lane, Send**

I object – The proposal to build additional housing on the Clockbarn site will only add to the traffic and poor access problems in the very narrow single track Tannery Lane with dangerous junctions at both ends. There is already planning permission for 63 houses to be built next to Tannery House, a new Narrowboat Basin is currently being built with access on to Tannery Lane and the proposal to make Send Business Centre into a Strategic Employment Site would mean increased traffic accessing this site as well!

I have often thought that the Clockbarn site with its large derelict greenhouse could be better used as a car park for the village (which has very little parking for its village centre and recreation ground) or even could have a few properties built on it classed as affordable or social housing to help those who cannot afford to live in the village once they have left home. However I feel the number of 60 houses far exceeds what is acceptable on the Clockbarn site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
POLICY A43 Land at Garlicks Arch, Send Marsh

I object – My previous objections to the building on this Green Belt site as stated in my 2016 response are still relevant. The addition of 8 Travelling Show People plots are a concern to me as surely they have very large vehicles and this site will be unsuitable for them due to poor access from the very narrow lanes, Kiln Lane and Burnt Common Lane? Would they want to be located in the middle of a housing estate with 400 houses and is there a proven demand for these plots?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

POLICY A58 Land at Burnt Common, London Road

I object – Originally it could have been a good use of this land at Burnt Common to be used for industrial or warehousing, however I have serious concerns that the allocation of a ‘minimum’ of 7,000 sq m of employment floor-space makes it open to further development in the future. I understood that there had been a decline in the need for land for industrial use? (See ‘Employment Land Need Assessment’ 2017).

We already have a very busy main road through Send, very congested at peak times and by having another site which large HGV have to access and may come through via Send Road from Woking, the current proposal on this site is unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Comment ID:** pslp171/265  **Respondent:** 11967329 / Anthony Sandifer Mallard  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Borough Planners have consistently ignored the views of experts and local people in respect of developments in Burpham. Local flooding has been the consequence of a lack of improved infrastructure when considering planning applications. Congestion and pollution has been exacerbated by poor planning decisions in respect of infill, housing and commercial development and the growth of a local secondary school with its greatly increased catchment area, necessitating the use of busses and domestic vehicles to convey pupils to and from the premises, combined with HGVs servicing the two superstores, has seen pollution levels climb exponentially. This increases demand on an already overburdened primary and secondary health care service.

The apparently planned 'improvements' to access to and from the A3 not only does not improve the situation of congestion and pollution but increases it, to the detriment of the residents and road users. Witness the now frequent congestion on the A3 around the Cathedral area, this backs up the southbound A3 carriageway and road users divert at the 'Merrow and Burpham Interchange' in the mistaken belief that this will improve their journey time. The reality is that the traffic is stationary or very slow moving through Burpham- and thus pollution is increased. To add to this by requiring any new and additional traffic to travel, from proposed developments, to the Northbound A3 [or Slyfield] via Burpham is frankly mindblowingly stupid. All the evidence points to a conclusion that it will increase the deadly effects of pollution and bring gridlock to the local roads.

The 'Improved' two way junction will do nothing to 'improve' the situation on the A3 and A3100. Any plans to extend 'potential' to 'reality' in respect of the B2234 will further increase the level of traffic and pollution. The proposed 'Sustainable Movement Corridor' along the A3100 is clearly an idea that appears 'good' on paper and has been drawn up by someone somewhat distant from the reality of the situation. Vehicles are becoming physically larger, traffic, as illustrated, is becoming heavier and Burpham's local roads are more and more frequently being used by HGVs, particularly, as mentioned, in the servicing of the two Burpham superstores, the road identified is not wide enough to allow two additional lanes for public transport. Is land and property to be compulsory purchased to fulfil this aspect of the plan? I would, however, agree, that in the event of realistically costed plan to build Guildford Tunnel on this part of the A3 - similar to the Hindhead one - then land does **NOW** need to be identified by way of forward planning. The Local Plan should, in my opinion, also encompass relevant aspects of the Highway Agency's Plans for this major route as it significantly impacts of the community at Burpham.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

**Comment ID:** pslp171/135  **Respondent:** 11967329 / Anthony Sandifer Mallard  **Agent:**
Let me first comment that the Borough asserts that it is listening to local views. It is clear that this is not the case. It may be hearing the residents views but it is obviously not listening to them, as it appears to have refused all requests for the calculations and assumptions that underpin, for example, the 'Housing Need Figure' to be made public. I am saddened by the apparent lack of transparency and openness in this respect and, reluctantly, I draw the conclusion that the Borough has something to hide.

A respected and independent analysis of the 'Housing Need figure' clearly shows that the Borough has chosen to overestimate that aspect of the plan and a per annum reduction reduction of around 250 new builds would be adequate to meet need. That equates to 7676 homes and not 13,893 over the period. This figure meets the clearly and carefully researched analysis undertaken by a respected national expert and is a reduction of over 6000 - a medium size village - over the period of the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I live off of Clay Lane in Burpham and pass over the A3 daily and witness the stationery traffic south bound towards Guildford twice a day. This traffic has dramatically increased over a relatively short period of time. The issue of the A3 needs to be overcome before thousands of new houses are built. The suggested tunnel under Guildford needs to be thoroughly investigated before houses are built in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/457  Respondent: 11967745 / Terence Vincent  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In view of flawed new evidence, Guildford’s proposal for more than 12,426 homes (plus a buffer of 1,155 homes) is excessive and will result in needless loss of Green Belt and green character, and increased congestion, that cannot be justified in our heavily constrained borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4159  Respondent: 11967777 / Christine Vincent  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

HOUSING:
The number of new housing suggested seems flawed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17090  Respondent: 11967777 / Christine Vincent  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

TRAFFIC:
I live off of Clay Lane in Burpham and pass over the A3 daily and witness the stationery traffic south bound towards Guildford twice a day. This traffic has dramatically increased over a relatively short period of time. The issue of the A3 needs to be overcome before thousands of new houses are built. The suggested tunnel under Guildford needs to be thoroughly investigated before houses are built in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1459   Respondent: 11992097 / Karen Fryatt   Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

-Lack off evidence for alleged housing need numbers which are more than double the previous figure given in 2012.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4032   Respondent: 11992097 / Karen Fryatt   Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>• Lack of specific details regarding the essential infrastructure needed including roads, junctions, sewage, amenities. Many of these need to be decided and started before a site such as Gosden Hill can be marked for development.</td>
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<tr>
<td>I believe the plan is unsound for reasons including but not limited to:</td>
<td>-building on Green Belt when there is brownfield sites available.</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

Disproportionate level of development focussing on one areas of the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/960  Respondent: 11992097 / Karen Fryatt  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

-the overly short consultation plan and the documents which is unreadable by those with poor eyesight (blue background with white text!!)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1840  Respondent: 11992097 / Karen Fryatt  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Lack off evidence for housing need numbers which is more than double the previous figure from in 2012.

there is also a disproportionate level of development in one area of the Borough and there is a real lack of detail regarding the specific details of the essential infrastructure. This includes the need to decision regarding the A3 (widening, extra 4 way intersection, tunnel etc) as well as sewage before, for example Gosden Hill can be ear marked for development

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPS16/5706</th>
<th>Respondent: 12039777 / Celia Howells</th>
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I am emailing to object to the Local Plan on the following grounds:

Massive loss of green belt - how will that affect us?

Development of Gosden Hill would double the size of Burpham without providing additional infrastructure

Increased traffic from developments without specific improvements to roads

Gosden Hill should not be developed at all until the proposed A3 tunnel plans have been confirmed.

Burpham has already seen a large increase in traffic due to Aldi - there is no capacity for more.

Sewage flooding is a regular problem in Burpham. Another 2200 homes on Gosden Hill will surely make it worse.

GBC has not explained how they reached the numbers for so much increased housing. The plan for Gosden Hill is disproportionate for the area

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Respondent: 12050145 / richard gunston</th>
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<td>There is no infrastructure in place to support such a building project</td>
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<td>There is no evidence to support the requirement for the number of houses intended -</td>
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<td>Gosden Hill in particular cannot be built until the roads and waste is sorted.</td>
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<td>The plan means considerable increase in pollution which is already high in Burpham.</td>
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<td>The Sewage system will need upgrading</td>
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<td>The traffic is already a nightmare – the proposals you have set out do not in any way satisfy the enormous increase in traffic your plan would attract. Burpham is already gridlocked and cannot possible handle and increase in traffic volume – The highways agency need to sort out the A3 before any of these developments proceed. A tunnel would be the most preferable option.</td>
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Executive Summary

These representations to the proposed submission Guildford Local Plan have been prepared by Dandara Ltd in the context of their interest in promoting the residential development of land to the west of Shere Road in West Horsley.

The housing strategy contained in the draft Local Plan is considered to be unsound due to an overreliance on large-scale, strategic housing sites which cannot deliver new homes until the middle to end of the Plan period due to associated infrastructure delivery burdens. The implication of this is that upon adoption, the Plan would not be able to reinstate a five year housing land supply due to the imbalance of small to medium scale sites able to deliver new housing in the shorter term compared with large-scale, strategic sites. This will exacerbate past rates of housing delivery shortfall, rising unaffordability and suppressed household formation rates. The main points made within the representations include:

- Guildford Borough has historically failed to meet its housing targets resulting in low levels of housing delivery, rising unaffordability and depressed rates of household formation;
- Over the first five years of the new Local Plan period, the Council expects to accrue a housing shortfall of minus 2,019 dwellings;
- In order to be considered effective and positively prepared, the new Local Plan should therefore be seeking to immediately address housing delivery shortfall experienced during the first five years of the Plan period and beyond, proactively boosting the availability and affordability of housing stock across the Borough;
- This strategy should be supplemented by a review of the SHMA to ensure that past trends of suppressed housing supply, increasing unaffordability and depressed household formation rates are being factored into the eventual objectively assessed housing need figure;
- Instead, the housing and spatial strategy of the new Local Plan disproportionately focuses on the delivery of a small number of large-scale, strategic housing allocation sites which will deliver over 50% of total objectively assessed need;
- Due to the scale of these proposed housing allocation sites, they require significant improvements to strategic infrastructure, including highways, before they can be brought forward;
- The Local Plan expects that these strategic housing allocation sites will not begin to deliver new homes until at least 2021/22 which even then is uncertain due to timescales, costs, sources of funding and viability associated with the accompanying strategic infrastructure improvements;
- This strategy, dominated by large-scale and longer-term housing sites is unable to reinstate a five year housing land supply following adoption of the Plan in direct conflict with para. 47 of the NPPF;
- The imbalance of the housing strategy is demonstrated by the Council being required to deliver in excess of 1,100 dpa towards the end of the Plan period, being significantly in excess of the 693 dpa or any observable historic completion rates;
- This disproportionate reliance on such larger-scale and longer-term housing sites fails to address historic under-supply of housing, present rates of unaffordability and absence of a five year housing land supply meaning that the Plan cannot be considered justified as the most appropriate strategy when considered against reasonable alternatives;
- The evidence base underpinning the housing strategy comprises a Green Belt and Countryside Study which includes a range of Potential Development Areas (PDAs) in which development could be located without undermining the five principal purposes of the Guildford Green Belt;
- These PDAs include smaller and medium scale sites, such as land off Shere Road in West Horsley, which would be able to deliver housing in the shorter term to allow Guildford to reinstate a five year housing land supply and to immediately start addressing historic under-delivery and unaffordability;
- The Council has failed to adequately assess the full role that PDAs could play in delivering much needed short term housing supply by incorrectly and selectively applying a Green Belt sensitivity map as a finite constraint for certain sites located within wider, ‘high sensitivity’ parcels;
- This ’macro scale’ Green Belt sensitivity map should not have been used by the Council to justify not assessing previously identified PDAs which were subject to much more robust, site specific assessment at a ‘micro scale’ which confirmed that their development would not undermine the Green Belt purposes of the wider parcel;
- Land to the west of Shere Road is one such PDA which is self-contained, visually and separately distinct from the wider ‘high sensitivity’ parcel and surrounded by existing urban influences such as the main A246 Epsom Road and housing;
• Land to the west of Shere Road was also assessed within the GBCS as being highly sustainable, the second most sustainable site in the Horsleys;
• By incorrectly applying the ‘macro scale’ Green Belt sensitivity map as a finite constraint for some sites and not others, for example Normandy / Flexford is located in a high sensitivity Green Belt parcel but is proposed for allocation for 1,100 new homes, the Council has developed an unsound housing strategy, unable to deliver sufficient housing over the early part of the Plan period;
• The Sustainability Appraisal recommends that the Council carefully considers options which could deliver in excess of OAN by up to 30% and has yet to test a scenario whereby PDAs surrounding existing villages deliver a higher quantum of new homes;
• By reassessing the potential for PDAs to deliver additional housing, the Council may also be able to consider whether they could assist neighbouring Authorities, particularly Woking Borough and the GLA, in delivering unmet need.

Introduction

These representations are submitted by Dandara Ltd in respect of the proposed submission version Guildford Borough Local Plan dated June Dandara Ltd are promoting land located to the west of Shere Road, south of the A246 Epsom Road and east of Wix Hill in West Horsley for residential development. The site measures circa 3.7 ha and comprises two field parcels which are currently used for grazing under licence. A red line site location plan is included alongside these representations and is reproduced in Figure 1 below.

The majority of the site was identified as a Potential Development Area (PDA) within the Guildford Green Belt and Countryside Study (GBCS) under site reference E4-B and provided with an indicative capacity of 56 new The site was also included within the Guildford Borough Land Availability Assessment 2016 (LAA) and provided with site ID 2025. An extract of the GBCS showing the identification of the majority of the site as a PDA is reproduced in Figure 2 below.

These representations will demonstrate that the current proposed submission draft of the Guildford Borough Local Plan is unsound having regard to the four tests set out at 182 of the National Planning Policy Framework (NPPF). It will be demonstrated that the Plan could be made sound if the Council robustly assessed the development potential of all PDAs identified in the GBCS. This would then allow the Council to increase their supply of housing within the earlier part of the Plan period, making up for past housing delivery shortfalls, using small and medium sized sites which are available and not considered to contribute to the five principal purposes of the Guildford Green Belt.

Dandara Ltd are one of the largest independently owned developers in the country and specialise in delivering high quality new homes which are inspired by their context and seamlessly integrate into the local Dandara only promotes sites where the intention is to deliver new homes as soon as possible. If allocated for residential development associated with the adoption of a future Local Plan, Dandara Ltd would look to prepare an immediate planning application with the delivery of new homes within 1-2 years of planning permission being granted.

In addition to making representations to the content of the proposed submission Guildford Local Plan, we will also comment where relevant on the following evidence base documents that have been prepared in support of the Plan:

• Guildford Green Belt and Countryside Study (various);
• Local Plan Sustainability Appraisal (2016);
• Land Availability Assessment (2016);
• West Surrey Strategic Housing Market Assessment (2015);
• Housing Implementation Strategy 2014;
• Various Topic Papers including Housing Delivery; Duty to Cooperate and Green Belt and the Countryside (2016).

Plan Preparation

Paragraph 151 of the National Planning Policy Framework (NPPF) requires Local Plans to be consistent with the principles and policies set out in the NPPF including the presumption in favour of sustainable development should inform Plan making by positively seeking opportunities to
meet the development needs of the Plan area and meet objectively assessed needs unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the NPPF as a whole.

Paragraph 152 draws this advice together by stating “Local Planning Authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three”. Importantly, policies in Local Plans should seek to deliver the homes and jobs needed in the particular area and plan positively for the development and infrastructure the area requires to meet the objectives, principles and policies of the

Paragraph 182 of the NPPF then goes on to explain that when the Local Plan is subject to Examination, the Inspector will consider whether it is found ‘sound’, assessing the following:

1. Positively Prepared – the Plan is based on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring Authorities where it is reasonable to do so and consistent with achieving sustainable development;
2. Justified – the Plan should be the most appropriate strategy when considered against reasonable alternatives;
3. Effective – the Plan should be deliverable over its period and based on effective joint working on cross-boundary strategic policies;
4. Consistent with National Policy – the Plan should enable the delivery of sustainable development in accordance with policies in the

Site Description

Land to the west of Shere Road, West Horsley measures circa 7 ha and is bounded by Epsom Road to the north, Shere Road to the east, Wix Hill to the west and existing housing to the south. The site was previously promoted to the Council under their LAA ‘call for sites’ for residential development comprising circa 56 new homes. A red line site location plan is reproduced below:

The site is located within the Green Belt and immediately to the south of the existing settlement boundary for West The site is surrounded by existing urban influences including the A246 Epsom Road and housing on Wix Hill, Shere Road and a private road immediately to the south. The site does not fall within the Surrey Hills AONB which is located further to the south, with no visual interconnectivity due to intervening residential properties on Shere Road and Jefferies Road. The site does form part of the much wider Surrey Hills Area of Great Landscape Value (AGLV). It is important to note that the site is not proposed to be included within the AONB as part of any on-going review into boundaries currently being undertaken by Natural England with specific focus on adjacent AGLV areas.

Green Belt Context

The suitability of the site to accommodate residential development was originally considered in the 2013 ‘Guildford Borough Green Belt and Countryside Study’ prepared on behalf of the Council by Pegasus Planning Group. It is important to note that the Green Belt and Countryside Study did not assess the whole of the site being promoted by Dandara Ltd and excluded the smaller of the two field parcels located adjacent to Wix Hill. However, as explained in the Green Belt section of these representations and within the accompanying Technical Note prepared by specialist landscape and Green Belt consultancy Define, this smaller field parcel is considered to display identical landscape and Green Belt characteristics to the wider assessed site.

The site was identified within the Study as falling within ‘Land Parcel E4’ which was considered, as a whole, to “… provide opportunities to accommodate appropriate development without significantly compromising the purposes of the Green Belt” (Volume 1, 20). In specific reference to site ‘E4-B’, the Study described it on pg. 125 as being “… surrounded by defensible boundaries including hedgerows and tree cover following the A246 Epsom Road to the north, hedgerows bordering Shere Road to the east, rising topography and hedgerows bordering residential properties at Wix Hill to the south and west of the PDA”. The Study then assesses nine environmental capacity criteria which are reproduced below:

Land Use - The PDA is currently used for arable farmland;

Topography - The PDAs are located on the lower slopes of the rising escarpment of the North Downs at White Hill. The PDAs are located on slightly sloping topography from the south to north, between approximately 85 and 90 metres AOD.
**Landscape Character** - The PDA comprises of two pastoral and arable fields located on sloping ground between residential properties on Wix Hill, Shere Road and the A246 Epsom Road. The fields are enclosed by moderate treebelts between the PDA and playing fields to the east, with residential gardens following Shere Road to the south and west of the PDA. Urban influences are generally provided by residential properties on Shere Road to the east and Will Hill to the west of the PDA.

**Landscape Value** - The PDAs are located within the Surrey Hills AGLV and approximately 0.2km to the north of the AONB.

**Nature Conservation** - The PDAs are not subject to any statutory or non-statutory nature conservation designations (n.b. SANGS provided at Long Reach Farm and Bens Wood, West Horsley).

**Cultural Heritage** - The PDAs are not subject to any statutory or non-statutory cultural heritage designations.

**Flood Risk** - The PDAs are not identified as land at risk from flooding.

**Agricultural Land Classification** - The PDAs are predominately located on Grade 3 (moderate/good) agricultural land.

**Public Rights of Way and Access** - The PDAs could potentially be accessed via Shere Road. There are no PROW crossing the PDAs.

As explained in 3.11 of the ‘Housing Delivery’ Topic Paper (2016), following the publication of the original GBCS, an additional Volume III addendum was prepared in response to a Joint Scrutiny Committee review of the evidence base. This followed concerns raised by Councillors and the public regarding the number of Green Belt sites proposed for development in the earlier draft of the Local Plan rather than specific criticisms of the GBCS methodology from statutory consultees.

One of the main outcomes of this review was the production of a Green Belt sensitivity map which included the site, as part of the wider Green Belt assessment parcel E4 as ‘high sensitivity’ Green The production of this additional Green Belt sensitivity map is assessed in more detail in the Green Belt section of these representations.

Having regard to 541 of the LAA (2016), the site has seemingly been rejected for allocation due to “our spatial strategy and site allocations have been considered through the Sustainability Appraisal and this site no longer accords with the proposed spatial strategy in the Local Plan. The site was identified in the Green Belt and Countryside Study but is located within high sensitivity Green Belt”.

These representations will demonstrate that the site should have been further considered for development given its identification as a PDA within the

**Sustainability**

The site is located in an inherently sustainable location, immediately adjacent to the established settlement boundary of West It is located within short walking distance of a variety of local shops and services including a Londis convenience store and dental practice immediately opposite with an ATM, village hall, public house, playground, playing fields and church within a ten minute walk. The adjacent A246 Epsom Road is served by two principal bus routes being the 479 and 478 which provide regular services into Guildford, Epsom and Leatherhead (no. 478 serves Horsley station).

As per Figure 4 below, Horsley railway station is less than a 10 minute cycle and provides train services into Guildford in less than 15 minutes and London Waterloo in an This part of East Horsley provides additional retail facilities and social and community services including banks, cafes, restaurants, post office, hairdressers, butchers, GP surgery and pharmacy. Land to the west of Shere Road in West Horsley is therefore sustainably located to provide ease of access to a variety of shops, services and public transport modes in accordance with para. 30 of the NPPF which states that “in preparing Local Plans, Local Planning Authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport”.

The NPPF advises at 84 that “when drawing up or reviewing Green Belt boundaries Local Planning Authorities should take account of the need to promote sustainable patterns of development”. In response, the GBCS assesses the sustainability of each identified PDA and concludes for both West and East Horsley that land to the west of Shere Road is the second most sustainable site looking both at access to social and community services and recreation facilities.
Availability

In accordance with 47 of the NPPF, land to the west of Shere Road, West Horsley is deliverable, with no known constraints to development; being available now; promoted by Dandara Ltd for residential development; offering a suitable and sustainable location for development; and being viable, allowing development to be delivered during the early part of the Plan period.

Green Belt and Countryside Study

These representations are accompanied by a Technical Note, prepared by specialist landscape and Green Belt consultancy Define, in respect of the Guildford Borough Green Belt and Countryside Study (GBCS). This Technical Note assesses in detail the Green Belt evidence base underpinning the proposed submission Local Plan, raising a number of substantive concerns regarding the methodology and particularly the latter production of a macro-scale, Green Belt sensitivity map which has been applied to land to the west of Shere Road, West Horsley as a finite constraint despite the site previously having been individually assessed and identified in the GBCS as a Potential Development Area (PDA). Furthermore, other sites proposed for allocation within the draft Plan fall within the same broad high sensitivity Green Belt designation yet are conversely deemed

Parcel Assessment

Volume I of the GBCS explains how Guildford Borough was divided into various assessment parcels which were then tested to understand how each parcel serves the purposes of the Green Para 1.6 expands upon this methodology by stating that “following the identification of parcels of land, such parcels were scored based upon their current adherence or otherwise to the purposes of the Green Belt. In particular, this included the ability to check the unrestricted sprawl of large built up areas, the prevention of neighbouring towns from merging into one another, assistance in safeguarding the countryside from encroachment, and the preservation of the setting and special character of historic towns”.

Land to the west of Shere Road in West Horsley is located within Parcel E4 for assessment purposes within the The Study concludes, having assessed the parcel against the five Green Belt purpose tests included at para. 80 of the NPPF, that “land parcels D6, E4 and E5 provide opportunities to accommodate appropriate development without significantly compromising the purposes of the Green Belt”. In order to understand which parts of the wider land parcels are potentially suitable for development without significantly compromising the purposes of the Green Belt, the GBCS goes on to identify individual Potential Development Areas (PDAs) within each wider land parcel.

Para. 1.23 explains that “the Study has demonstrated that there are a number of areas which provide opportunities to appropriately accommodate development within the surroundings of certain villages across the Borough”. The majority of the land falling to the west of Shere Road in West Horsley being promoted for residential development by Dandara Ltd was identified as PDA ‘E4-B’. The full entry for parcel E4 and PDA E4-B is reproduced below, taken from pg. 20 of Volume I of the GBCS.

The GBCS therefore considered the developability of land in the Green Belt based upon the following four principal stages:

Stage One - Sub-division of the Borough into separate land parcels;

Stage Two - Assessing the degree to which each land parcel contributes to the five principal purposes of the Green Belt established within para. 80 of the NPPF;

Stage Three – Following the identification of PDAs within those parcels considered to provide development potential without undermining the principal purposes of the Green Belt, each of the PDAs were assessed from a sustainability perspective including ease of access to shops, services and social and community facilities;

Stage Four - Assessing the environmental capacity of the land parcels to accommodate appropriate development.

Sustainability and Environmental Capacity
Volume V, Appendix XIV of the GBCS considers the sustainability credentials of each PDA based upon a variety of indicators including distance to shops, services and sustainable transport. The assessment is split into two, the first part looking at the proximity of everyday services and the second part looking at the proximity of recreation facilities. Each PDA is given a score depending upon the distance to each named facility, which are then totalled to give an overall placing out of 44 PDAs.

In respect of accessibility to a range of shops, services and public transport modes, land to the west of Shere Road, West Horsley (PDA E4-B) is provided a sustainability score of 25 which places the site 18th most sustainable out of the 44, thus falling within the top 40%. The second part of the assessment, considering accessibility to recreation facilities, gives the site a sustainability score of 9 with equates to an average of 2.25 for each indicator, placing the site as the joint second most sustainable in respect of access to recreation facilities amongst all 44 PDAs.

Looking at the comparative sustainability of all West Horsley and East Horsley (North and South) PDAs, of which there are a total of seven, land to the west of Shere Road (PDA E4-B) is considered to be the second most sustainable in respect of access to shops, services and sustainable transport modes, with a total score of 25. Looking at access to recreation facilities, land to the west of Shere Road (PDA E4-B) similarly performs second best, with a total score of 9 (n.b. the next most sustainable site only has a score of 5).

The site was then subject to Environmental Capacity Analysis within Volume 3 of the The PDA parcel ‘E4-B’ was assessed on pg. 125 as being “… surrounded by defensible boundaries including hedgerows and treecover following the A246 Epsom Road to the north, hedgerows bordering Shere Road to the east, rising topography and hedgerows bordering residential properties at Wix Hill to the south and west of the PDA”. The Study then assesses nine environmental capacity criteria which are reproduced below:

**Land Use** - The PDA is currently used for arable farmland;

**Topography** - The PDA is located on the lower slopes of the rising escarpment of the North Downs at White Hill. The PDA is located on slightly sloping topography from the south to north, between approximately 85 and 90 metres AOD.

**Landscape Character** - The PDA comprises of two pastoral and arable fields located on sloping ground between residential properties on Wix Hill, Shere Road and the A246 Epsom Road. The fields are enclosed by moderate treebelts between the PDA and playing fields to the east, with residential gardens following Shere Road to the south and west of the PDA. Urban influences are generally provided by residential properties on Shere Road to the east and Will Hill to the west of the PDA.

**Landscape Value** - The PDA is located within the Surrey Hills AGLV and approximately 0.2km to the north of the AONB.

**Nature Conservation** - The PDA is not subject to any statutory or non-statutory nature conservation designations.

**Cultural Heritage** - The PDA is not subject to any statutory or non-statutory cultural heritage designations.

**Flood Risk** - The PDA is not identified as land at risk from flooding.

**Agricultural Land Classification** - The PDA is predominately located on Grade 3 (moderate/good) agricultural land.

**Public Rights of Way and Access** - The PDA could potentially be accessed via Shere Road. There are no PROW crossing the PDA.

**Addendums**

When the Council consulted on their previous 2014 draft Local Plan, land to the west of Shere Road was identified as falling within parcel E4 which was considered to have development potential, latterly refined to include the majority of Dandara Ltd’s site as PDA E4-B. Furthermore, the site was considered to be amongst the most sustainable surrounding existing villages across the Borough and subject to no known The clear recommendation made by the GBCS was that the Council should give serious consideration to the development potential of the site as PDA E4-B.

However, 3.6 of the ‘Green Belt and Countryside’ Topic Paper explains that some additional work was undertaken to the GBCS evidence base “… arising from a resolution made at an extraordinary meeting of the Council on 13th January 2014
which resulted in a special Local Plan Scrutiny Forum, held on 4th March. The enabled the community to share their further views on the evidence base and raise issues concerning methodology and fact”.

Para. 4.18 of the ‘Housing Delivery’ Topic Paper (2016) attempts to explain this additional work in more detail:

“The draft Local Plan (2014) treated all PDAs as reasonable options for development regardless of the extent to which the land parcel within which it sits scored against Green Belt purposes (as shown on the sensitivity map). However, following the feedback from consultation and the new evidence available, we have reconsidered how Green Belt is used as a constraint. The Proposed Submission Local Plan seeks to give weight to the sensitivity of the Green Belt parcel within which each PDA is located. Whilst PDAs have been identified on the basis that they would not fundamentally harm the main purposes of the Green Belt, there would nevertheless be, in relative terms, more harm caused by allocating sites within land parcels assessed as contributing more towards the purposes of the Green Belt than those judged to be of lesser Green Belt value. In giving greater weight to the sensitivity of the Green Belt, we are have therefore sought to ameliorate the consequent impacts on the Green Belt as much as is reasonably possible”.

The production of this latter evidence base identifies the entirety of parcel E4 as falling within ‘high sensitivity’ Green The LAA then seemingly uses the application of this additional evidence base addendum to justify not only the exclusion of PDA E4-B from the proposed submission Local Plan, but also to justify not considering the site for development in any further detail despite the clear recommendation of the original GBCS and the identification of the land as a PDA. These representations raise the following serious concerns regarding the methodology of the composite GBCS, expanded upon in the accompanying Technical Note prepared by Define:

(i) Inconsistencies of Methodology

As explained above, the original GBCS divided the Borough into a series of ‘macro-scale’ Green Belt assessment parcels which were then subject to the five NPPF Green Belt purpose tests to establish their development potential. Whilst the majority of parcel E4, due largely to much of the land to the south falling within the Surrey Hills AONB, was not considered suitable for development, it was recognised that the far north-east corner displayed characteristics of self-containment that justified its identification as PDA E4-B. The GBCS has therefore justifiably started the assessment of each parcel from a ‘macro-scale’, applying the five Green Belt purpose tests set out in the NPPF, prior to then identifying PDAs at a site-specific, ‘micro-scale’ which should be considered further for

The justification of the Council provided in 4.18 of the ‘Housing Delivery’ Topic Paper that “… in relative terms, more harm is caused by allocating sites within land parcels assessed as contributing more towards the purposes of the Green Belt than those judged to be of lesser Green Belt value”, is unjustified and unsound. This is principally because, as recognised in Volume IV of the GBCS, the parcelisation process is not based on ‘quality’ of the Green Belt but defensible boundaries such as roads, railway lines and land forms. On this basis, it is obvious that any parcel, regardless of its overall sensitivity, could contain sites which contribute little to the main Green Belt purposes of the wider parcel.

As recognised by the original GBCS which identified land to the west of Shere Road, West Horsley as a PDA, the site-specific features are wholly different from the typical performance of the wider Green Belt parcel in which the site is located (E4) in regard to its sensitivity to the Green Belt purpose. The majority of this wider parcel is open and rolling countryside, and is not adjacent, between, or wholly enclosed by urban features (housing or roads) which is evident for Dandara Ltd’s site. The site is located on rising land that is well structured by housing and vegetation, and as a result has very limited visibility from the wider landscape, a point of detailed assessment highly relevant to understanding likely Green Belt effects. The latterly commissioned ‘macro-scale’ Green Belt sensitivity map simply does not have the ability to recognise or appreciate this level of assessment detail.

It is unsound for the Council to present an evidence base which commences with a ‘macro-scale’ parcel assessment prior to then focusing on individual PDAs within certain parcels which are not considered to contribute to the five principal NPPF Green Belt purpose. To then subsequently apply a latter ‘macro-scale’ Green Belt sensitivity map which is treated as superseding the more detailed ‘micro-scale’ PDA assessments previously undertaken, is neither a robust nor defensible position. The PDA assessments comprised site-specific analysis of whether certain parts of wider parcels were developable and would have included consideration as to whether development of a particular site would have a wider adverse impact upon the parent parcel from a Green Belt purpose perspective. This approach is in direct conflicts with paras. 84 and 85 of the NPPF which advise that when defining boundaries, LPAs should inter alia ensure consistency with the Local Plan.
strategy for meeting identified requirements for sustainable development, and not include land which it is unnecessary to keep permanently open.

(ii) Absence of Assessment

Despite the identification of land to the west of Shere Road, West Horsley as a PDA within the GBCS, with the recommendation that the Council should give serious consideration to the development potential of each PDA in more detail, the Council has used the latter application of the Green Belt sensitivity map to seemingly justify exclusion of the site from the proposed submission Local Plan. Whilst the Council have commissioned a latter Green Belt sensitivity map which places parcel E4 within high sensitivity Green Belt, the Authority has made no effort, unlike the original GBCS, to assess the site further to understand the contribution it makes to the characteristics of the wider parcel that make it ‘high sensitivity’.

Due to poor Plan preparation, one of the most sustainable sites in the Horsleys which is not considered to contribute to the five Green Belt purpose tests as identified within an independent, professionally produced Study has been excluded from consideration due to a line drawn on a map demonstrating in the attached Technical Note and expanded upon above, if the Council had undertaken this work, they would have concluded that land to the west of Shere Road shares none of the high sensitivity characteristics of the wider parcel, applying the NPPF Green Belt purpose tests.

(iii) Inconsistency of Application

The Council has also not been consistent in how the Green Belt sensitivity mapping has informed their decision. Whilst they have used the fact that land to the west of Shere Road, West Horsley now falls within high sensitivity Green Belt as the only reason to justify its exclusion as a potential allocation site, land at Normandy / Flexford (Policy A46) was only ever partially identified as a PDA; has latterly been identified as falling within high sensitivity Green Belt; but has subsequently been proposed for allocation in the proposed submission Local Plan for 1,100 new homes.

Furthermore, this proposed housing allocation occupies almost the entire extent of Green Belt parcel H12, which is all of high Green Belt This ‘high sensitivity’ Green Belt classification therefore applies to the entirety of this housing site as being of high sensitivity to Green Belt purposes, and it cannot be accurately claimed (as it can for land to the west of Shere Road and Green Belt parcel E4) that the difference in scale and performance of the wider Green Belt parcel and the site itself has distorted the site’s Green Belt sensitivity and subsequent judgement of its development credentials. As can be seen from Figure 6 reproduced below, the Council is proposing housing allocations in a number of parcels of Green Belt identified as being of high sensitivity (parcels H12, K2 and K9), yet has used the same designation as justification for the rejection of land to the west of Shere Road despite it previously being identified as a PDA.

Draft Allocation Sites

These representations will go on to demonstrate that the Council should revisit previously identified PDAs in order to deliver a more balanced housing strategy capable of reinstating a five year housing land supply following adoption of the Plan. This would achieve a more certain, balanced and equitable spread of housing delivery across the Borough which reduces the current over-reliance on the delivery of large-scale, strategic sites with significant infrastructure burdens. There are also significant landscape and Green Belt benefits to be delivered from reducing the scale of existing proposed allocations alongside increasing the number of smaller and medium scale sites deliverable over the Plan period:

Former Wisley Airfield – Whilst it is acknowledged that part of the site is located on previously developed land, the scale of development proposed at 2,100 new homes will represent a significant incursion into the Guildford Green Belt. Development of this scale will represent both significant encroachment into open countryside and the perception of urban sprawl into an otherwise largely undeveloped, rural part of the Borough. Given the isolation of the proposed allocation, it is recognised that future residents would rely on the use of the private car and regular bus services to access places of employment and higher order centres. This will generate significant movement within a much wider part of the Guildford Green Belt, undermining its rurality and increasing the sense of urbanisation. Furthermore, the scale of the proposed development bears no relationship to the settlement pattern in this part of Guildford which comprises small to medium scale villages and hamlets. The number of new homes proposed will also result in significant pressure upon the existing highway network, immediately adjacent SPA, local infrastructure and nearby habitats. The development, given its scale, will also be visible from the Surrey Hills AONB to the south which has not been taken into adequate consideration during
the Plan making process. It is difficult to understand how the allocation of Wisley Airfield accords with the advice in para. 84 of the NPPF that “when drawing up or reviewing Green Belt boundaries, Local Planning Authorities should take account of the need to promote sustainable patterns of development”.

**Normandy and Flexford** – The Council is proposing to allocate 1,100 new homes in-between the two rural villages of Normandy and Flexford. This part of the Borough comprises Green Belt considered to be of high sensitivity, with development of this scale fundamentally undermining the NPPF Green Belt purposes of protecting the countryside from encroachment, preventing the coalescence of settlements and preventing urban sprawl.

Development of this scale would represent a significant incursion into high sensitivity Green Belt and the urbanisation of an otherwise rural part of the Borough providing relief from the built up character of Guildford, Ash, Tongham and Aldershot and in conflict with para. 84 of the NPPF. It is of particular concern that the allocation is, as confirmed at para. 4.133 of the ‘Housing Delivery’ Topic Paper, to accommodate a secondary school which would serve a catchment extending from Guildford in the east to Ash / Tongham in the west. The extent of this catchment would result in significant daily vehicular movements within the Green Belt crossing some of the most strategic parcels, separating Guildford from Aldershot, undermining its tranquillity and sense of rurality;

**Land off East Lane, West Horsley** – Due to the Council not giving any substantive consideration to the developability of PDAs, such as land off Shere Road, West Horsley, by virtue of it being located within wider, high sensitivity Green Belt parcels, it has resulted in sites being proposed for allocation which, looking at a site specific level, have a greater impact on the NPPF Green Belt purpose tests. For example, the proposed development of land off East Lane, West Horsley represents both urban sprawl and encroachment into open countryside which would see significant development crossing East Lane to the south which currently provides a clear, defensible boundary in Green Belt terms. In contrast, land to the west of Shere Road is surrounded by existing urban influences such as the A246 Epsom Road and housing and would represent coherent in-fill, rather than encroachment into open countryside.

**Green Belt and Countryside Study – Conclusions**

These representations have demonstrated that land to the west of Shere Road, West Horsley was identified in the Council’s own GBCS as a PDA following an assessment of the wider land parcel against the five NPPF Green Belt purpose It has been shown that the GBCS recognised that the site was self-contained, dominated by urban influences with no visual interconnectivity with the adjacent AONB. The site was also shown to be one of the most sustainable in West and East Horsley with no known landscape or physical constraints to realising development.

Dandara Ltd has commissioned a Technical Note prepared by specialist landscape and Green Belt consultancy Define which concurs with the assessment of the GBCS that the site should be considered further for development as a PDA, applying the five NPPF Green Belt purpose tests:

- Development would not distort the settlement pattern or create urban sprawl, it would resolve the land between Epsom Road and land off Shere Road / Wix Hill, and would have low effect on the Green Belt purpose of checking urban sprawl;
- Development would have a low effect on preventing towns merging, and would effectively act as infill between West Horsley and existing development off Shere Road/ Wix Hill;
- Development would result in a low effect on safeguarding the countryside from encroachment - the site does not appear as being countryside, largely due to being located between the A246 and existing properties off Shere Road / Wix It would form a boundary to countryside to the east, and its eastern boundary would need to reflect the loose character of existing properties off Wix Hill. A combination of rising topography and vegetation structure results in this land having very limited visibility from the local or wider landscape;
- Development would have negligible effects on preserving the setting and character of historic towns as it has no physical or visual relationship with West Horsley, or its Conservation Area, and;
- Promoting urban regeneration is applicable as a general principle, and is not applied on a site-by-site basis.

Despite the GBCS already undertaking a macro-scale assessment of wider land parcels followed by the site-specific, micro-scale identification of individual PDAs, the LPA commissioned the production of additional Green Belt sensitivity mapping following an extraordinary meeting of the Council on 13th January 2014 and the establishment of a Local Plan Scrutiny. This addendum work identified the entirety of parcel E4 as high sensitivity Green Belt which the Council has used to
justify not undertaking any further assessment of the development potential of land to the west of Shere Road, West Horsley, despite its earlier identification as a PDA.

These representations and the accompanying Technical Note have demonstrated that the Council is unjustified in applying an additional ‘macro scale’ Green Belt sensitivity layer, when the GBCS had already considered whether wider parcels had an opportunity to accommodate development without undermining the NPPF Green Belt purpose. It is unsound for the Council to disregard this earlier evidence and the development potential of a site simply because a much later, ‘macro-scale’ sensitivity map has identified it as falling within a more sensitive wider parcel. This ‘macro-scale’ level of mapping cannot supersede much more detailed ‘micro-scale’ assessment work which identified certain PDAs in parcels which, perhaps being more sensitive overall than others, can nevertheless better accommodate development so as not to undermine the role of the wider parcel in Green Belt terms.

The Council has acted unsoundly in failing to consider the developability of sites identified as PDAs in the GBCS, this being their own evidence base, and recommended for further Instead, the Council has rejected certain sites on the basis of falling within a latter, ‘macro scale’ higher sensitivity parcel despite other proposed allocations, such as Normandy / Flexford, not only being located within a similar higher sensitivity parcel, but with the scale of development proposed covering a significant proportion of that parcel. This approach is inconsistent with paras. 84 and 85 of the NPPF, unevidenced and in order to be found sound, the Council must revisit those sites previously identified as PDAs in the GBCS to consider whether they could deliver housing in the short to medium term to allow the Council to reinstate a five year housing land supply and establish a more balanced housing strategy over the entirety of the Plan period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  
Land off Shere Road Site Location Plan.pdf (282 KB)  
GBCS Technical Note (Shere Road - West Horsley).pdf (1.1 MB)  
Representations to Proposed Submission Guildford Local Plan (July 2016).pdf (1.7 MB)  
GB Sensitivity Map (Shere Road - West Horsley).pdf (4.5 MB)

Comment ID: PSLPA16/4296 Respondent: 12062017 / Dandara Ltd (John Richards) Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Five Year Housing Land Supply

Paragraph 47 of the NPPF states that Local Authorities should “identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the Plan period) to ensure choice and competition in the market for land”. The PPG advises that “the examination of Local Plans is intended to ensure that up-to-date housing requirements and the deliverability of sites to meet a five year supply will have been thoroughly considered and examined prior to adoption ...” (Para. 033, Ref ID: 3-033-20150327).

The Plan period runs for 20 years from 2013-33. The Council is therefore required to deliver 693 x 20 = 13,860 units based on the current objectively assessed need (OAN) of 693 dpa minus any Duty to Cooperate

Five Year Housing Land Supply– Accumulated Shortfall
Over the first three years of the Plan period, 4.174 of the ‘Housing Delivery’ Topic Paper (2016) confirms that the Council delivered the following:

2013/14 = 136 (-557 shortfall)
2014/15 = 249 (-444 shortfall)
2015/16 = 343 (-350 shortfall)
Total = -1,351 (2013-16)

Over the first three years of the Plan period, there was a shortfall in housing completions of -1,351. The housing trajectory included on pg. 20 of the LAA suggests that during the first five years leading up to the adoption of the new Local Plan, 2013-18, the shortfall in housing delivery will have increased further to -2,109. The PPG is clear that “Local Planning Authorities should aim to deal with any undersupply within the first five years of the Plan period where possible (i.e. Sedgefield methodology). Where this cannot be met in the first five years, Local Planning Authorities will need to work with neighbouring authorities under the Duty to Cooperate” (para. 035, ref ID: 3-035-20140306).

To accord with the guidance set out in the PPG, the -2,019 unit shortfall accrued over the first five years of the Plan period should be added to the five year housing land supply requirement of 3,465 units (693 x 5) to give a housing requirement over the period 2018/23 following adoption of the Plan of 5,484 (1,097 dpa). This will ensure that the Plan is positively prepared in order to ensure a five year housing land supply is reinstated following adoption of the

**Five Year Housing Land Supply– Applying Buffer**

The NPPF states at 47 that to boost significantly the supply of housing Local Authorities should “… identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the Plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, Local Planning Authorities should increase the buffer to 20% (moved forward from later in the Plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land”.

The Council acknowledge at 4.169 of their ‘Housing Delivery’ Topic Paper that “… since 2008/09 completions have been persistently less than the original South East Plan housing number (322 homes per year) …”. Furthermore, “for the last seven years, completions have been less than 300 homes per year”. The Council has failed to meet its housing target during any of the past eight monitoring years which is considered to demonstrate categorically the “record of persistent under delivery of housing” required by para. 47 of the NPPF to justify the imposition of a 20% buffer.

As we will consider in detail elsewhere in these representations, the Council’s spatial strategy which relies on the allocation of large-scale, strategic housing allocations which require significant improvements to strategic infrastructure to allow delivery has further worsened the ability of the Authority to deliver sufficient housing to maintain a five year housing land supply.

It is therefore considered that there has been a clear record of persistent under delivery of housing which, applying para. 47 of the NPPF, would require the application of a 20% buffer to the five year housing land supply calculation, moved forward from later in the Plan. The Council has previously accepted that the application of a 20% buffer is appropriate within their October 2015 Annual Monitoring Report. The Council is therefore considered to have a five year housing land supply requirement as follows:

- 693 x 5 = 3,465 units;
- 2,019 shortfall from period 2013/18;
- Total 5 YHLS target = 3,465 + 2,019 = 5,484 plus 20% = 6,581.

Whilst the PPG advises that any accrued housing shortfall during the early part of the Plan period should be made-up as soon as possible within the first five years (Sedgefield methodology), it is expected that the Council will argue that this
shortfall should be spread over the Plan period due to the extent of Green Belt coverage across Guildford Borough acting as a constraint to increasing housing delivery over the shorter term (Liverpool methodology). If the Inspector is minded to agree with this approach, the five year housing land supply calculation would be as follows:

- 693 x 5 = 3,465 units;
- 2,019 shortfall from period 2013/19;
- 2,019 shortfall divided by remaining years in Plan period of 15 = 135 dpa (rounded);
- Total 5 YHLS target = 3,465 + 675 (135 x 5) = 4,140 plus 20% = 4,968.

**Five Year Housing Land Supply– Projected Completions**

Projected housing completions are shown within the housing trajectory on 20 of the LAA. Over the five year period following adoption of the Plan, the Council considers that it is able to deliver the following new homes:

2018/19 = 519;
2019/20 = 863;
2020/21 = 861;
2021/22 = 783;
2022/23 = 1,031.

Total supply over the period 2016/21 = 4,057.

**Five Year Housing Land Supply– Position**

As calculated above, the Council requires the delivery of either 4,968 or 6,581 new homes over the period 2018/23 following adoption of the Plan to ensure the reinstatement of a five year housing land supply in accordance with 47 of the NPPF. However, due to the Council’s overreliance on large-scale, strategic sites with associated infrastructure delivery challenges, identified supply over the same period equates to a maximum 4,057 new homes. This results in a shortfall in housing land supply over the next five year period of either - 911 or -2,524 depending upon whether the Sedgefield or Liverpool methodology is used to calculate past shortfall.

The proposed submission Local Plan is not currently in accordance with 47 of the NPPF as, following adoption, it would be unable to reinstate a five year housing land supply resulting in a shortfall of between – 911 or -2,524 depending upon whether the Sedgefield or Liverpool methodology is used to calculate past shortfall.

The Local Plan therefore needs to identify additional sources of short term housing supply to ensure a five year housing land supply is able to be reinstated following adoption.

We have demonstrated elsewhere in these representations that there are alternative Green Belt sites, such as land off Shere Road in West Horsley, which are smaller in scale, able to be delivered within five years following adoption of the Plan and have been identified in the Council’s own Green Belt and Countryside Study as Potential Development Areas worthy of further consideration.

However, if, as the Council would appear to be suggesting in 4.171 of the ‘Housing Delivery’ Topic Paper, they are unable to reinstate a five year housing land supply following adoption of the Plan due to Green Belt sensitivity issues, which at the present time is the case even applying the Liverpool methodology plus 20%, then the PPG is clear that “where this cannot be met in the first five years, Local Planning Authorities will need to work with neighbouring authorities under the Duty to Cooperate”. The Council have provided no evidence to date to demonstrate that they have sought to engage with other West Surrey HMA Authorities to discuss the possibility of them accommodating unmet need arising from Guildford during the early to middle part of the new Local Plan period in order to ensure a five year housing land supply is maintained. The
emerging Plan cannot therefore be considered to satisfy the ‘positively prepared’ or ‘justified’ test of soundness as set out in para. 182 of the NPPF.

**Housing Strategy**

In order to be found sound, the emerging proposed submission Local Plan must be shown to be justified having regard to 182 of the NPPF being “... the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence”. Furthermore, it must also be shown to be positively prepared, “... based on a strategy which seeks to meet objectively assessed development and infrastructure requirements”.

As we have demonstrated elsewhere in these representations, the Council has consistently failed to deliver sufficient numbers of new homes to meet the former South East Plan housing target of 322 dpa with 4.169 of the ‘Housing Delivery’ Topic Paper (2016) recognising that “for the last seven years, completions have been less than 300 homes per year”. Furthermore, housing completions over the first five years of the new Local Plan period (2013-18) are expected to be below the 693 dpa required to meet OAN resulting in a cumulative shortfall of minus 2,019 units. This pattern of consistent under-delivery of housing has resulted in a significant worsening of affordability within Guildford Borough, depressing household formation rates and resulting in an Authority where “affordability pressures in the West Surrey market are severe, with lower quartile house prices over ten times the annual income of young households” (2015 SHMA, para. 7.45).

There is strong evidence that the major pressures facing Guildford Borough surround historically depressed rates of housing delivery which have fed into an unbalanced housing market where the increasingly limited housing stock is unaffordable for the majority of existing and future The new Local Plan provides an opportunity for the Council to proactively address this historic undersupply of housing by accelerating housing completions over the early to middle part of the Plan period in direct response to acute housing need and affordability barriers. However, the housing and spatial strategy proposed by the Council is not currently able to achieve this principal policy objective.

**Housing Strategy – Reliance on Large, Strategic Sites**

As can be seen from Table 1 of the proposed submission Local Plan, the Council is proposing to allocate a number of large-scale, strategic development sites which, alongside other allocations and sources of housing supply, will allow the Council to meet its housing target of 13,860 new homes over the period 2013-33 excluding any Duty to Cooperate These large-scale, strategic development sites will deliver circa 7,140 new homes or just over 50% of the total comprising:

- 3,940 new homes as part of urban extensions to Guildford town;
- 2,100 new homes at the former Wisley Airfield;
- 1,100 new homes as part of Normandy and Flexford village

However, as can be seen from the housing trajectory produced on 20 of the LAA, none of these large-scale, strategic sites are expected to begin delivering any new housing until at least 2021/22. There is thus an obvious discord between a Local Plan which, in line with NPPF and PPG guidance, should be looking to reinstate a five year housing land supply on adoption, especially given historic under-supply of housing and associated issues of affordability, and a housing strategy where over 50% of supply is reliant on longer term, large-scale strategic sites despite their being alternative / additional sites available. The ‘Housing Delivery’ Topic Paper explains why housing on these sites cannot come forward earlier:

**Guildford Urban Extensions** – Both Blackwell Farm and Gosden Hill Farm require significant improvements to strategic highways infrastructure to facilitate development for new homes. Gosden Hill Farm is required to deliver a new railway station at Guildford East (Merrow) in addition to a new vehicular access off the A3 which must be planned in conjunction with wider Highways England works whilst Blackwell Farm requires an access off the A31 with ongoing work requiring the potential delivery of a new Guildford West (Park Barn) railway station;

**Former Wisley Airfield** – This site also requires significant improvements to strategic highways infrastructure including upgrading of the A3; a through vehicular link between the A3 Ockham interchange and Old Lane; as well as a series of improvements to the existing highway network including the A3 / M25 junction, Ripley High Street and A3 on-slip;

**Normandy / Flexford** – Whilst this site, unlike the Guildford urban extensions and the former Wisley Airfield is not dependent upon A3 infrastructure timescales, the quantum of development proposed in an otherwise rural part of the
Borough is reliant upon a number of strategic infrastructure improvements including a new local centre; secondary school; SANGS and highway improvements that will delay the delivery of any future housing.

Para. 4.117 of the ‘Housing Delivery’ Topic Paper acknowledges that “the Plan is heavily reliant on the delivery of larger strategic sites to meet OAN, the delivery of which are linked to the necessary improvements to the A3 (with the exception of North Street and Normandy / Flexford)”. Para. 4.130 goes further and suggests that the Guildford urban extensions and Wisley Airfield, despite being shown as delivering new homes from 2021/22 in the LAA housing trajectory, will be unable to deliver new homes during the five year monitoring period following adoption of the Plan due to dependency on A3 infrastructure timescales – “the delivery of this site [Normandy / Flexford] is not dependent on A3 infrastructure timescales, and can start to deliver within the first five years following adoption of the Local Plan”.

Para. 4.5 of the ‘Transport’ Topic Paper (2016) states that “existing road and parking infrastructure is already inadequate or under pressure and would worsen with the planned development ... i.e. A3 and M25 and in particular the A3/M25 junction area”. We also know from the evidence base, including para. 4.117 of the ‘Housing Delivery’ Topic Paper referred to above, that the delivery of the large-scale, strategic housing sites is explicitly linked to, and reliant upon, necessary improvements to the strategic highway network and particularly the A3.

Having regard to Appendices 3 and 4 of the ‘Transport’ Topic Paper, and taking Wisley Airfield as an example, it is evident there is significant uncertainty regarding timescales and funding associated with the delivery of strategic infrastructure improvements required to facilitate the delivery of new homes on the Airfield, the following strategic transport infrastructure improvements are required associated with the A3 / M25 junction; A3 capacity; site accesses; bus network improvements; and cycle network improvements:

1. SRN3 – M25 Junction 10 / A3 Wisley Interchange ‘Road Investment Strategy’ – this is shown as being an ‘anticipated’ improvement costing £100-250 million and funded by Highways England and developer The notes suggest that development at Wisley Airfield would be required to at least fund an ‘interim’ improvement if it is to come forward ahead of the full SRN3 works;
2. SRN9 and SRN10 – Northbound and southbound slip roads at A247 Clandon Road – this is shown as being an ‘anticipated’ improvement costing £20 million in total and funded in full associated with the development of Wisley Airfield;
3. LRN7 - Interventions to address potential highway performance issues resulting from development at the former Wisley Airfield site – this is shown as being an ‘anticipated’ improvement costing £25 million and funded in full by developer contributions associated with the development of Wisley The notes suggest that the full scope and cost has yet to be determined and will be confirmed as part of any future Transport Assessment;
4. BT3 – significant bus network improvements serving the former Wisley Airfield site – this is shown as being an ‘anticipated’ improvement with the cost to be The notes make clear that “required as part of bus improvements for the site in perpetuity to meet minimum sustainability criteria”;
5. AM3 – off-site cycle network improvements serving the former Wisley Airfield site - this is shown as being an ‘anticipated’ improvement with the cost to be The notes make clear that this is “required to meet minimum sustainability criteria”.

As the Council notes in 4.117 of the ‘Housing Delivery’ Topic Paper, “the Plan is heavily reliant on the delivery of larger strategic sites to meet OAN, the delivery of which is linked to necessary improvements to the A3 (with the exception of North Street and Normandy Flexford)”. This strategy is however a conscious choice by the Council who have chosen to exclude from further consideration previously identified PDAs. Having regard to the ‘Transport’ Topic Paper, informed by the ‘Guildford Borough Transport Strategy’ (2016) and the Surrey County Council ‘Strategic Highway Assessment Report’ (2016), Dandara Ltd has significant concerns regarding delivery, funding and anticipated completion rates associated with the large-scale, strategic allocation sites.

Delivery of Strategic Infrastructure

One of the key tests of soundness for the emerging Guildford Borough Local Plan as set out at 182 of the NPPF is that the policies are ‘effective’ whereby “… the Plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities”. Having reviewed the evidence base, the timescales associated with the delivery of strategic transport infrastructure improvements required to support a number of the proposed large-scale, strategic housing allocations are currently unknown, as are the total costs and sources of funding.
Given the scale of strategic transport infrastructure improvements required, such as A3 / M25 junction improvements, it is imperative that the Council can satisfy a future Inspector that there is a sufficient level of certainty of delivery, funding and timescales in order to inform assumptions regarding housing delivery. The proposed submission draft Local Plan is proposing that just over 50% of total housing delivery is associated with large-scale, strategic housing allocations, many of which can only be brought forward if significant improvements to strategic transport infrastructure are delivered. It is therefore imperative that the Council can demonstrate that such improvements are deliverable and will be in place in conjunction with assumptions made regarding delivery of new homes. At present, Appendix 4 of the ‘Transport’ Topic Paper simply suggests that such improvements are ‘anticipated’ when they need to be firm commitments if the proposed housing strategy in the Local Plan is to be found sound.

Assumptions Regarding Housing and Infrastructure Delivery

Appendix 3 of the ‘Transport’ Topic Paper demonstrates the relationship between the timescales associated with the delivery of strategic transport infrastructure and the delivery of new homes on large-scale, strategic allocation. The Council assume that delivery of strategic transport improvements, necessary to allow new homes to be delivered on a number of the large-scale, strategic allocation sites, will take place in parallel with the delivery of new homes. For example, works to SRN9, SRN10 and LRN7 associated with the development of Wisley Airfield are anticipated to commence 2021/22, the same year as the scheme delivers its first new homes. It is therefore imperative that the Council provides a clear evidence base that demonstrates that the strategic transport network can accommodate additional demand from large-scale sites whilst such improvement works are on-going and that there would be a commitment from the market to deliver.

At present, it is unclear the quantum of new homes that the strategic transport network can accommodate whilst the works are on-going and not. An obvious example relates to the delivery of SRN9 and 10 which provide for northbound and southbound slip road accesses onto the A247 at Clandon Road for the use of future residents of the Wisley Airfield site. These works are shown in Appendix 3 as being undertaken during the period 2021/22 to 2027/28. However, by 2027/28, which is the latest date by which the works are anticipated to be completed, Wisley Airfield is projected to have delivered 650 new homes. It is therefore unclear whether the Council is able to commit to Wisley Airfield delivering 650 new homes by 2027/28 if all or a proportion of associated vehicular movements are reliant upon the delivery of SRN9 / 10, or other such strategic transport improvements, the timescale of which is currently uncertain and could be as late as 2027/28.

Viability

The PPG states that Local Plans should “… pay careful attention to providing an adequate supply of land, identifying what infrastructure is required and how it can be funded and brought on stream at the appropriate time; and ensuring that the requirements of the Plan as a whole will not prejudice the viability of development” (ref: ID: 12-018-20140306).

We have demonstrated above for Wisley Airfield, as taken from the ‘Transport’ Topic Paper and of equal relevance to other proposed large-scale, strategic allocation sites, that there is a significant financial burden associated with the delivery of strategic transport improvements which are necessary to allow the development to come forward. Having regard to Appendix 4 of the Topic Paper, and excluding as yet unknown contributions towards public transport improvements, it is anticipated that Wisley Airfield would fund at least £145 million of strategic transport improvements (£100 million for SRN3; £20 million for SRN9&10; and £25 million for LRN7). Assuming Wisley Airfield delivers 2,100 new homes as per Table 1 of the proposed submission Local Plan, this would require a contribution of circa £69,000 per unit toward strategic transport improvements alone, excluding any other contributions.

In addition to financial contributions towards the delivery of strategic transport improvements, the large-scale, strategic allocations are also expected to contribute towards the delivery of inter alia the following:

- Localised retail;
- Social and community facilities;
- Primary and secondary education;
- Health facilities;
- Sport and leisure facilities;
- SANGS;
- Open Space;
- Pedestrian and cycle networks;
• Biodiversity and habitat enhancements;
• Affordable housing;
• Employment facilities

In order to ensure that the emerging Local Plan is able to satisfy the NPPF ‘effective’ test of soundness in terms of being deliverable over its period, the Council must undertake a robust and thorough viability assessment to demonstrate that the proposed allocations are able to fund the significant range of strategic and localised infrastructure and social and community service improvements which are required in order to ensure the proposed allocations can be sustainably delivered without necessary improvements to strategic transport infrastructure as highlighted above but also requires the delivery of a raft of associated social and community facilities and sustainable transport improvements given its isolated nature. Furthermore, given the chronic need for affordable housing identified within the SHMA and considered elsewhere in these representations, it is also important to ensure that viability considerations do not impact upon the ability of such schemes to deliver much needed affordable housing.

Projected Completions

These representations have previously raised concerns regarding housing being delivered on large-scale, strategic allocation sites immediately following the commencement, rather than substantive completion, of associated improvements to strategic transport infrastructure which is required in conjunction with new homes being delivered. However, concerns are also raised in respect of projected housing completions shown within the housing trajectory set out on 20 of the LAA. There are two principal concerns that the Council should take into consideration:

1. **Cumulative Completions** – The Local Plan housing delivery strategy is structured in such a way that significant numbers of new homes are expected to be delivered in the latter part of the Plan period associated with the delivery of a small number of large-scale, strategic transport improvements. During the last five years of the Plan period, the Council is expecting to deliver between 1,136 and 1,260 housing completions per annum. Given that the Council has not delivered over 500 new homes during any year over the past decade (2006/16), it is imperative that the Authority is able to demonstrate that the housing market is able to absorb this number of completions which are significantly in excess of the OAN of 693 dpa. This unevidenced completion rate is a further indicator of the imbalance of the Council’s proposed housing strategy which is over reliant on large-scale, strategic allocation sites which deliver later in the Plan period compared with a more equitable spread of small, medium and large scale sites which are able to deliver a more balanced completion rate, closer to assessed OAN;

2. **Total Completions** – The Council project that the large-scale, strategic allocation sites are each capable of delivering up to 270-290 new homes per annum. The Council should provide evidence, based on schemes elsewhere in the south-east of a comparable scale, that such rates of delivery are achievable, given the associated infrastructure burdens accruing to the sites, and the potential for three large-scale, strategic sites being expected to deliver, and the market support, in excess of 200 new homes per annum each, simultaneously during the last five years of the Plan period (Gosden Hill Farm, Blackwell Farm and Wisley Airfield).

Housing Strategy – Conclusions

The proposed submission Local Plan is heavily reliant on a small number of large-scale, strategic housing allocation sites to deliver their housing target. The majority of these new homes cannot be delivered until the completion of a range of strategic transport improvements, being 2021/22 at the latest. This has resulted in a housing strategy that is unable to reinstate a five year housing land supply following the adoption of the Plan due to the later delivery of housing associated with the proposed allocation of large-scale, strategic housing sites. This is a conscious choice by the Council having chosen not to assess previously identified PDAs in any further detail.

Furthermore, and having regard to Table 1 of the proposed submission Local Plan, over 50% of the new homes to be delivered between 2018 and 2033 are contained within four large-scale strategic allocation sites (Gosden Hill Farm, Blackwell Farm, Wisley Airfield and Normandy / Flexford). These sites all rely on the delivery of strategic transport improvements which are currently uncertain in respect of delivery, timescales and there is a significant risk that the Council is proposing to adopt a housing delivery strategy which is overly reliant on large-scale, strategic sites which are...
fundamentally tied to the delivery of transport infrastructure which is inherently uncertain. Furthermore, the majority of these strategic transport improvements are intended to be partly or fully funded by the developments, raising significant concerns about viability.

The Council is aware from its evidence base that past records of under-delivery of housing has resulted in a depressed housing stock, causing rising unaffordability and suppressed household formation rates. The priority of the emerging Local Plan, embodied within the housing strategy, should therefore be to ensure that sufficient housing is delivered during the early part of the Plan period in order to immediately address past shortfalls and accord with the requirement of 47 of the NPPF to boost significantly housing delivery. Instead, the Council is proposing a housing strategy that is unable to reinstate a five year housing land supply or positively address past housing shortfalls due to over-reliance on a small number of large-scale, strategic allocations which are unable to be delivered until at least 2021/22 due to associated and uncertain strategic transport improvements.

The Plan is not considered to meet the ‘positively prepared’, ‘justified’ or ‘effective’ tests of soundness as it does not meet objectively assessed housing need within the early part of the Plan period; is not the most appropriate strategy when considered against alternatives; and is not deliverable over the Plan. Instead, the Council should consider allocating a larger number of small and medium scale sites, such as revisiting PDAs previously identified in the Green Belt and Countryside Study, in order to ensure that a sufficient quantum of homes are able to be delivered in the earlier part of the Plan period in order to reinstate a five year housing land supply and to reduce over-reliance on the delivery of complex, costly and uncertain major strategic transport improvements.

The Council suggest at 4.171 of their ‘Housing Delivery’ Topic Paper that it is not possible to meet short term housing need without developing many high sensitivity Green Belt sites. However, as is the case with land off Shere Road in West Horsley, such small to medium scale sites are available, have been identified as PDAs within the Green Belt and Countryside Study and are able to deliver new homes in the early part of the Plan period. As can be seen from Table 2 of the Sustainability Appraisal (SA) Non-Technical Summary (2016), the Council has not considered an Option which looks to increase housing delivery on Green Belt sites surrounding villages – for example, housing delivery numbers for the Horsleys remain at 445 in all eight Options – and therefore do not have the evidence base to demonstrate that earlier rates of housing delivery are not achievable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  
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Comment ID: PSLPA16/4297  
Respondent: 12062017 / Dandara Ltd (John Richards)  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Meeting Full Housing Need

Paragraph 47 of the NPPF requires Local Authorities to ensure that their Local Plan “… meets the full, objectively assessed needs for market and affordable housing in the housing market area …” as far as is consistent with the policies included in the There are two specific points to consider in paragraph 47 – (i) the NPPF does not simply require Local Authorities to meet objectively assessed housing need but crucially, full objectively assessed housing need, and (ii) the Local Authority should seek to meet full objectively assessed need for both market and affordable housing.

In order for the proposed submission version Local Plan to be in accordance with the NPPF, it must therefore include a housing target that is able to meet the District’s full, objectively assessed need for both market and affordable

Establishing Full, Objectively Assessed Housing Need

In order to establish the full, objectively assessed need for market and affordable housing in Guildford Borough, the Council commissioned GL Hearn, working alongside other Authorities falling within the West Surrey Housing Market Area (HMA), who published their ‘West Surrey Strategic Housing Market Assessment’ in April 2014 (SHMA).

10.37 of the SHMA concludes that the overall need for housing in Guildford Borough over the period 2013-33 equates to 693 dwellings per annum (dpa) being a total of 13,860 new homes over the Plan period. The SHMA concludes that as a whole, the West Surrey HMA, which also includes Waverly and Woking Councils, has a total housing need of 1,729 dpa being a total of 34,580 new homes over the Plan period.

Dandara Ltd recognises that Guildford Borough Council has used the conclusions of the SHMA that the Borough requires a total of 13,860 new homes over the Plan period to inform their housing target contained in Policy S2 of the proposed submission draft Local However, it is considered that there are various aspects of the methodology underpinning the conclusions of the SHMA that warrant further assessment.

In accordance with the PPG, the SHMA uses household projections published by the DCLG as a starting point for estimating future housing need in Guildford and across the HMA (para. 015, ref ID: 2a-015-20140306). The 2012-based DCLG household projections published in February 2015 are considered to be the most up-to-date and are those referred to within the However, the PPG goes on to make three important points with respect to the use of household projections published by the DCLG:

1. The household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. For example, formation rates may have been suppressed historically by under-supply and worsening affordability of housing (para. 015, ref ID: 2a-015-20140306);
2. Plan makers may consider sensitivity testing, specific to their local circumstances, based on alternative assumptions in relation to the underlying demographic projections and household formation rates (para. 017, ref ID: 2a-017-20140306);
3. The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings including house prices, rates of development and affordability (para. 019, ref ID: 2a-019-20140306).

These representations will go on to demonstrate that there are various factors underpinning the evidence base that suggest that Guildford Borough Council should consider increasing their housing target in accordance with guidance set out in the NPPF and

Demographic Projections

The SHMA clearly demonstrates that there has been slow growth in the available housing stock within the West Surrey As an example, para. 3.6 states that between 2001 and 2011, the total housing stock within the West Surrey HMA increased by 6.2% which is less than growth observed across both England as a whole (8.3%) and the South East region (8.9%). This comparatively slow increase in the housing stock is most observable within Guildford Borough which experienced only 5% growth over this period. The SHMA concludes that “this is despite indicators of above average demand, and is likely to reflect development constraints”.
The suggestion in the SHMA that the slow observable rates of housing growth across the HMA, and in Guildford in particular, is as a result of development constraints rather than lack of demand is supported by having regard to historic housing completions. 4.169 of the ‘Housing Delivery’ Topic Paper (2016) states that “… since 2008/09 completions have been persistently less than the original South East Plan housing number (322 homes per year … for the last seven years, completions have been less than 300 homes per year”.

What is observable across the HMA but focused on Guildford in particular, is a repeating pattern of low rates of housing delivery set within a context of high demand. This suppression of availability of stock has resulted in Guildford Borough having the second highest median house prices in Surrey / Hants at £320,000 as shown in Table 1 of the SHMA with the average price of a home in parts of Guildford, such as West Horsley, being an untenable £850,890, as shown in Table 2 of the This represents an increase in house prices of 8% across Guildford as a whole during the period 2007/12 with an even more dramatic increase of between 12%-14% for Guildford town and villages such as West Horsley over the past four years.

In such cases, where there is demonstrable evidence of supressed supply resulting in rising house prices and worsening affordability, the PPG is very clear that “the household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past For example, formation rates may have been suppressed historically by under-supply and worsening affordability of housing” (para. 015, ref ID: 2a-015-20140306).

The SHMA reports that the 2012 SNNP suggests that the population of West Surrey is projected to grow at a rate below that expected across both the region and the country including due to lower levels of in-migration (para. 4.11). Furthermore, historic household growth in West Surrey has been quite modest in comparison with other areas with a percentage increase expected from 2013-33 of only 17.9% compared with 21% for Surrey and 20.8% for the South-East region (para. 4.51). It is therefore important that the Council satisfies itself that, as advised by the PPG, the 2012 SNNP should not be adjusted, potentially significantly, due to a more detailed interrogation of the impact that a historic lack of supply, leading to increasing levels of unaffordability, has had upon population growth, levels of in- migration and rates of household formation in the West Surrey SHMA and especially Guildford Borough.

The SHMA recognises that the 2012 SNNP projections “show some suppression in household formation rates for people aged 25-34” (pg. 66), which is the age at which the majority of UK residents attempt to establish themselves on the housing ladder. There is a clear observable link between the inability of younger age groups to establish new households and a lack of housing supply and affordability which is unsurprising given high house The Council should give serious consideration to the ability to adjust the 2012 SNNP projection to allow for an improved rate of household formation moving forward, based upon a higher housing target delivering additional homes which improves both housing stock availability and affordability within Guildford.

As a final point on the interpretation of the 2012 SNNP, we would support the alternative population projection applied in 4.73 which follows the GLA migration model of taking a rate which is half of the difference between pre-recession migration rates and the trends feeding into the SNNP. Whilst this adjustment does see higher population growth of 14.5% across the HMA over the Plan period compared with 13.6% under the SNNP projection, it does bring the projection more in-line with long term past trends than is the case with the SNNP (para. 4.75). This adjustment ensures a closer relationship to past trends compared with the SNNP which envisages a slower level of population growth than experienced historically, in a context of an undersupply of housing at unaffordable rates.

Affordable Housing

Paragraph 47 of the NPPF makes it clear that Local Authorities should ensure their Local Plan meets “… the full, objectively assessed needs for market and affordable housing in the housing market area”. The PPG provides clear advice in respect of how affordable housing need should be considered in terms of Plan preparation stating, “The total affordable housing need should then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led An increase in the total housing figures included in the Local Plan should be considered where it could help deliver the required number of affordable homes” (ref. ID: 2a-029-20140306).
The SHMA demonstrates within Table 42 that there is an estimated affordable housing need in the West Surrey HMA of 1,144 dpa which equates to 455 dpa in It is however recognised that this does not demonstrate actual affordable housing need as it does not take into account factors such as the role of the private rental sector (PRS) in meeting housing need or the fact that affordable housing stock will be recycled when families or individuals move from one property to another. The SHMA therefore goes on to look purely at affordable housing need arising from concealed and homeless households which suggests that in Guildford only 403 households require housing.

However, the recommendation of the SHMA that an uplift of only 59 dpa across the HMA would be sufficient to address affordable housing need is not considered to be in accordance with 47 of the NPPF nor advice provided in the PPG for the following reasons:

1. The SHMA excludes all those households that currently rely on the PRS for their affordable accommodation, supplemented by the Local Housing Allowance (LHA). Para.6.72 of the SHMA makes it clear that “the overall estimated number of lettings in the LHA part of the PRS can therefore be seen to be 50% of the total net need derived through the affordable housing needs analysis”. Whilst it is accepted that PRS does, and will continue to, play an important role in affordable housing provision, it does represent an inherently unstable tenure due to the continued availability of funding mechanisms such as the LHA; the role of private landlords and the tenure being available as market housing; the insecurity of the tenure if a landlord decides to re-let or sell the property; and the aspirations of people to own their own home. It is strongly recommended that the Council considers whether a larger adjustment to the housing target should be made to increase affordable housing delivery and reduce such reliance on the PRS sector. This is considered especially important in an Authority such as Guildford where lack of supply and affordability in the owner-occupied sector pushes market demand into the PRS sector which, due to finite supply, then pushes up rents and directly competes with those relying on the tenure for affordable housing;

2. Table 48 does not appear to consider affordable housing need arising from newly forming households which the Council should confirm with GL Hearn, especially in an Authority within which household formation rates have been historically supressed;

3. Whilst the SHMA is correct in ensuring that double-counting does not take place when one affordable home is vacated to allow for occupation by an alternative household in affordable housing need, the Council should satisfy itself that this assumption allows for some flexibility where affordable housing is vacated but is not available for reoccupation due to it being unsuitable for habitation;

4. There does not appear to be an assessment regarding existing affordable housing stock and whether an increase in the housing target could deliver a more appropriate range of unit types and sizes to meet up-to-date housing needs evidence.

**Economic Growth**

The PPG advises that “Plan makers should make an assessment of the likely change in job numbers based on past trends and/or economic forecasts as appropriate and also having regard to the growth of the working age population in the housing market area” (ref. ID: 2a-018-20140306).

The SHMA reports that for Guildford, workplace employment is anticipated to grow by between 6% and 1.1% per annum between 2013-33. To establish the change in the resident workforce required to match the forecasted number of jobs, the SHMA multiplies the commuting ratio by the amount of ‘double jobbing’ to achieve an adjustment factor. For Guildford, the increase in workforce jobs between 2013-33 of 17,738 equates to a change in the resident workforce of 15,307. The SHMA concludes that “… for the resident workforce to increase in line with the forecast number of jobs would require around 637 homes per annum to be delivered in Guildford ...”.

Whilst the SHMA adopts a ‘policy off’ approach to potential future changes in commuting patterns (para. 21), it is important for the Council to consider the recommendations made in respect of the relationship between future jobs growth and future housing growth, and existing commuting patterns. Para 5.19 of the SHMA explains that “the only area to see net in-commuting is Guildford where there are about 7,800 more people working in the Local Authority area than living there (and are working)”. This evident pattern of in-commuting reflects both the sub-regional economic role of Guildford (especially Guildford town) but also the lack of affordable market housing stock within the This level of in-commuting results in a variety of significant
issues for the Borough including highway capacity (especially the A3), traffic congestion (especially Guildford town centre), air quality issues and others associated with significant daily commuting in and out of the Borough for employment. The Council should give serious consideration to whether an upward adjustment should be made to the housing target to not only ensure that the resident workforce increases in line with anticipated jobs growth, but also that there is a proactive policy response which attempts to reduce the level of in-commuting due to an increased number of more affordable homes available for local employees.

Market Signals

As previously discussed, the SHMA demonstrates that average house prices across the HMA are significantly above the south-east average, with entry level house prices circa 11 or more times the typical earnings of younger The SHMA concludes at para. 7.47 that “overall the analysis of market signals and affordable housing needs points clearly to higher affordability pressures in the HMA than in other parts of the country” (para. 7.47).

The PPG advises that “the more significant the affordability constraints (as reflected in rising prices and rents, and worsening affordability ratio) and the stronger other indicators of high demand (e.g. the differential between land prices), the larger the improvement in affordability needed and, therefore, the larger the additional supply response should be” (para. 020, ref ID: 2a-020-20140306).

The response of the SHMA to addressing some of the most unbalanced affordable market housing stock in the country, set against a background of historic under delivery of housing, is to provide an additional 103 homes across the HMA in order to “... return household formation rates of those aged 25-34 to 2001 levels by 2033”. Whilst we consider it robust to apply household formation rates to those age groups most likely to be trying to get onto the housing ladder, it is not considered that seeking to re-establish household formation rates seen in 2001 in 25-34 year olds by 2033 is sufficiently

In Guildford, the adjustment to address some of the worst affordability in the country equates to just 31 additional dwellings per It is considered that there is a real opportunity for the Council to make a demonstrable difference to affordability by not simply trying to re-establish 2001 household formation rates observable in 25-34 year olds by the very end of the Plan period, but significantly before that.

These are households that are unable to get on the housing ladder now and given that 2033 is 17 years away, even those that are 25 years old now, will no longer be in the age group from which the target is A whole decade of Guildford residents will continue to experience unaffordability and the Council should consider whether an increase in 31 dpa is a sufficiently proactive response given the extreme nature of housing need and affordability in Guildford and the wider HMA. One response may be for the Council to consider what the associated housing target increase would be if they sought to re-establish 2001 household formation rates in 25-34 year olds by a mid-point of 2025. The ability of the Council to truly improve affordability is further compounded by the housing strategy being focused on the delivery of longer-term, strategic scale sites rather than focusing upon the delivery of small to medium scale sites which can be brought forward earlier, making an immediate impact on availability of housing stock and associated affordability.

Establishing Full, Objectively Assessed Housing Need - Conclusions

Dandara Ltd is supportive of the Council in seeking to meet full, objectively assessed need as established by the 2015 West Surrey However, in order to ensure that the emerging Local Plan is in full accordance with the requirement of para. 47 of the NPPF to boost significantly housing supply and meet full, objectively assessed need for market and affordable housing, it is recommended that the Council revisit certain aspects of the methodology underpinning the SHMA:

- In respect of the robustness of the 2012 SNNP and whether they require adjustment, the Council should consider in further detail the impacts that historic under-delivery of housing and worsening affordability has had on past and projected rates of population growth, in-migration (domestic and international) and household formation rates and whether these require adjustment;
- In respect of affordable housing need, the Council should consider in further detail whether continued reliance on the PRS to provide circa 50% of affordable housing need in the Borough is justified given the characteristics of the tenure and the increasing pressure placed upon existing PRS properties in Guildford from market renters given affordability issues in the owner-occupied market;
• The Council should consider whether an upward adjustment should be made to the housing target to attempt to reduce rates of in-commuting into the Borough due to a lack of affordable market housing;
• The Council should consider re-establishing 2001 household formation rates earlier in the Plan period to deliver a demonstrable improvement in affordability for the generation that is currently priced out of the housing market.

### Duty to Cooperate

Paragraph 178 of the NPPF makes it clear that Local Authorities have a duty to cooperate on planning issues that cross administrative boundaries, particularly in respect of the NPPF ‘strategic priorities’ set out in paragraph 156 which include Paragraph 179 advises that “Local Planning Authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly co-ordinated and are clearly reflected in individual Local Plans”. It then reiterates that “Joint working should enable Local Planning Authorities to work together to meet development requirements which cannot wholly be met within their own areas ...”.

The PPG recognises that the duty to cooperate is not a duty to agree but “... Local Planning Authorities should make every effort to secure the necessary cooperation on strategic cross boundary matters before they submit their Local Plans for examination”. The PPG goes on to state that Local Planning Authorities will “... need to bear in mind that the cooperation should produce effective and deliverable policies on strategic cross boundary matters” (para. 001, ref ID: 9-001-20140306).

### Housing Market Area

The Council commissioned GL Hearn to prepare a Strategic Housing Market Assessment which, having regard to price trends and dynamics; commuting flows; and migration patterns, concluded that “... all three primary sources clearly demonstrate significant interaction between Guildford, Waverley and Working” to a degree that “... strongly supports defining these three Authorities within the same Housing Market Area” (para. 54).

Para 4 of the Topic Paper entitled ‘Housing Delivery’ (2016) recognises that in respect of housing delivery, “... there is currently unmet need arising within our HMA from Woking Borough Council”. Whilst Waverley Borough Council is currently preparing a new Local Plan which is proposing to meet the Authority’s own objectively assessed housing need in full, Woking Borough “... has an adopted housing requirement of 292 dwellings [per annum] (2010 – 2027) against an objectively assessed need of 517 [dwellings per annum]. There is therefore a shortfall of 225 homes per year between 2013 and 2027, a total of 3,150 homes”.

The SHMA provides evidence of a particularly strong relationship between Guildford and Working Boroughs including in respect of migration where there is an annual flow of almost 1,200 persons between the two Authorities (para. 31) alongside a strong economic relationship where “the strongest commuting flow from Woking is to Guildford ...” (para. 2.43). Having regard to the NPPF and PPG, there is thus a strong case to be made that Guildford should be seeking to accommodate some of the unmet housing need originating in Woking Borough given the particularly strong relationships between the two, evidenced by migration and employment flows between these two members of the West Surrey HMA. The PPG advises that “the aim is to encourage positive, continuous partnership working on issues that go beyond a single Local Planning Authority’s area” (para. 008, ref ID: 9-008-20140306).

### Guildford Borough Response

The Council has prepared a Topic Paper entitled ‘Duty to Cooperate’ (2016). It recognises that the Council, alongside Waverley and Woking Boroughs, worked together to commission a SHMA in recognition of strong inter-relationships within the HMA, including housing. As previously discussed, the Topic Paper recognises that “... there is currently unmet need arising within our HMA from Working Borough Council”. In response, the three Authorities are understood to be in the process of agreeing a Statement of Common Ground on housing delivery which “... recognises that there is unmet need within the HMA and commits the three Authorities to continued future joint working to ensure that as far as possible, and subject to the policies in the NPPF, housing needs across the HMA are met in full” (para. 42).

Despite the rhetoric associated with the preparation of a Statement of Common Ground relating to unmet housing delivery within the HMA, the Topic Paper would appear to suggest that, having regard to the Councils Sustainability Appraisal (SA) and policies contained in the NPPF, the emerging Local Plan is seeking to deliver a housing figure which should be
considered as the maximum without any scope to address unmet housing need arising within the The Council is clear that “... we do not consider that we can sustainably accommodate any unmet need arising from Woking ...”.

Having regard to the Council’s ‘Housing Delivery’ and ‘Duty to Cooperate’ Topic Papers (2016), it is evident that the Council’s position is that the Authority is only able to accommodate the number of new homes required to meet Guildford’s own objectively assessed housing need and that any housing numbers in excess of this, would fundamentally conflict with policies contained in the NPPF and the achievement of sustainable development. The Council is not therefore suggesting a review of the Local Plan following culmination of on-going work to prepare a Statement of Common Ground as their position is clear that the Borough cannot accommodate any additional homes to assist neighbouring Working Borough in meeting their housing need as this would result in fundamental conflicts with NPPF policy and the achievement of sustainable development.

Dandara Ltd does not however accept that the Council has presented robust evidence to demonstrate that the Authority is unable to accommodate any additional housing to assist Woking Borough with meeting its own unmet need for the following principal reasons:

1. **Sustainability Appraisal** – the 2016 Sustainability Appraisal (SA) tests a variety of housing delivery options ranging from meeting objectively assessed need for Guildford Borough only up to an OAN plus 34% Whilst the SA strongly recommends that the two bookend options are rejected – OAN only and OAN plus 34% - it concludes that “the mid-range options are all associated with pros and cons, and necessitate close consideration” (non-technical summary, Table 3). The Council cannot therefore use the conclusions of the SA to suggest that the Borough cannot accommodate any unmet housing need arising from Woking Borough as apart from the OAN plus 34% option, the SA concludes that all other options that deliver in excess of OAN, including OAN up to 30%, should be afforded careful and close consideration. There is no evidence that the Council has undertaken this additional assessment work in the context of the Duty to Cooperate;

2. **Green Belt** – It is recognised that the NPPF allows the Green Belt to be taken as a finite constraint when considering the levels of housing to be accommodated within an individual Local Authority area. However, as explained earlier in these representations, the Council commissioned a Green Belt and Countryside Study which in 2014, identified a number of Potential Development Areas (PDAs) within the Green Belt which were recommended for further assessment to establish their development. These PDAs were identified through a robust four stage assessment process which included:

- sub-dividing the Guildford Green Belt into individual land parcels;
- assessing the degree to which each land parcel contributes to the purposes of the Green Belt;
- assessing the sustainability credentials;
- assessing the environmental capacity of the land parcels to accommodate appropriate.

Dandara Ltd’s site off Shere Road in West Horsley was identified as PDA E4-B but has been provided with no further detailed assessment by the Council to justify why it is not proposed for allocation for The only justification provided to date concerns the application of a latter macro scale ‘Green Belt Sensitivity’ layer which is addressed in detail earlier in these representations. The Council’s own evidence base therefore identifies a range of PDAs which have been subject to robust assessment within the independent Green Belt and Countryside Study and recommended for further. These PDAs would allow the Council to consider increasing its housing delivery target to assist Woking Borough address unmet need without fundamentally conflicting with the five principal Green Belt purpose tests. The PDAs were specifically identified as being capable of accommodating development without undermining the principal objectives of the Guildford Borough Green Belt:

“The Study intends to provide the Council with sufficient flexibility to allocate the necessary number of village PDAs and through consideration of the Green Belt purposes score, sustainability rankings and environmental constraints, allows for comparison between those PDAs that have been identified, prior to potential allocation by the Council” (para. 4.9).

**Unmet Need from London**

The Topic Paper entitled ‘Duty to Cooperate’ (2016) recognises that the recently adopted 2015 FALP is unable to meet full, objectively assessed housing need derived from the London Boroughs, with a shortfall of circa 7,000. The Topic Paper recognises that the West Surrey SHMA indicates “... increased out migration from London into Guildford with an increase of 51 dwellings per year for Guildford above the demographic projection [568 homes per annum]”. It however goes on to
conclude that “... given this [51 dpa] is lower than the full OAN for Guildford of 693 homes per annum [including an uplift for economic and affordability factors], no further uplift is required in response to this” (para. 4.33).

The Council would appear to be acknowledging that there is a direct relationship between unmet housing need in London and the ability for Guildford to accommodate a proportion of this need given expected future increases in in-migration from London. However, it is not proposed to apply an uplift to the OAN figure on the basis that the 51 dwellings per year are able to be accommodated within the already uplifted housing delivery figure of 693 dwellings per year, applying economic and affordability factors. This however fundamentally misapplies the methodology underpinning the SHMA.

The 51 dpa need arising from London is in addition to need arising from economic and affordability factors which have been taken into account when calculating the As recognised within the West Surrey SHMA, “... there is a notable level of commuting from ... Guildford to London – with commuting of ... 9,000” (para. 2.46). The 51 dpa does not therefore fall within an adjustment to OAN based on future job creation in Guildford Borough nor to improve affordability for existing residents but rather to assist London Authorities with addressing some modest unmet need. The Council is not proposing an uplift to OAN to reflect unmet need of 51 dpa arising from London which should be given serious consideration taking into account the strong relationship Guildford has with London in respect of out-commuting for work and future in-migration.

Conclusion

The NPPF and PPG are clear that when Inspectors are considering whether a Local Authority has discharged their Duty to Cooperate, they must consider whether such engagement has resulted in the delivery of effective and deliverable policies on strategic cross boundary. The evidence base acknowledges that Guildford sits within an established HMA which collectively is unable to meet full, objectively assessed housing need. In addition, there is also unmet housing need originating in Greater London with which Guildford Borough has an established economic and in-migration relationship.

The Council is suggesting that despite a commitment to enter into a Statement of Common Ground intended to address unmet housing need, the Borough is unable to accommodate additional housing growth on behalf of Woking Borough or London due to finite constraints surrounding Green Belt coverage and the achievement of sustainable. These representations have demonstrated that the SA does not suggest that a higher level of housing growth cannot be sustainably accommodated within the Borough, up to OAN plus 30% worthy of further assessment, whilst the Green Belt and Countryside Study identifies a variety of PDAs which do not contribute to the five main purposes of the Guildford Green Belt and are worthy of further assessment.

In respect of land off Shere Road in West Horsley which was identified as PDA E4-B, the Council has not assessed the potential of the site to accommodate development in any further detail despite evidence provided by Dandara Ltd to demonstrate the limited contribution the site makes to the Green. It is therefore considered that the Council has not satisfactorily demonstrated that additional housing could not be accommodated within the Borough to address unmet need evident within the HMA and from London with both the SA and Green Belt and Countryside Study suggesting additional housing sites could be developed without fundamentally conflicting with policies contained in the NPPF.

At present, the proposed submission Local Plan is not considered to be sound as it has not been positively prepared with an absence of effective and deliverable policies to address unmet housing need within the. The evidence base does not justify why a higher housing delivery figure could not be accommodated within Guildford and as the PPG advises:

“The Duty to Cooperate requires Authorities to work effectively on strategic planning matters that cross their administrative boundaries. The Duty to Cooperate is not a duty to agree and Local Planning Authorities are not obliged to accept the unmet needs of other planning authorities if they have robust evidence that this would be inconsistent with the policies set out in the National Planning Policy Framework, for example policies on Green Belt, or other environmental constraints” (para. 021, ref ID: 9-021-20140410).

Summary and Conclusions

These representations conclude that the proposed submission Guildford Borough Local Plan is currently unsound for the following principal reasons:

- Guildford Borough has historically failed to meet its housing targets resulting in low levels of housing delivery, rising unaffordability and depressed rates of household formation;
• Over the first five years of the new Local Plan period, the Council expects to accrue a housing shortfall of minus 2,019 dwellings; In order to be considered effective and positively prepared, the new Local Plan should therefore be seeking to immediately address housing delivery shortfall experienced during the first five years of the Plan period and beyond, proactively boosting the availability and affordability of housing stock across the Borough; This strategy should be supplemented by a review of the SHMA to ensure that past trends of supressed housing supply, increasing unaffordability and depressed household formation rates are being factored into the eventual objectively assessed housing need figure; Instead, the housing and spatial strategy of the new Local Plan disproportionately focuses on the delivery of a small number of large-scale, strategic housing allocation sites which will deliver over 50% of total objectively assessed need; Due to the scale of these proposed housing allocation sites, they require significant improvements to strategic infrastructure, including highways, before they can be brought forward; The Local Plan expects that these strategic housing allocation sites will not begin to deliver new homes until at least 2021/22 which even then is uncertain due to timescales, costs, sources of funding and viability associated with the accompanying strategic infrastructure improvements; This strategy, dominated by large-scale and longer-term housing sites is unable to reinstall a five year housing land supply following adoption of the Plan in direct conflict with para. 47 of the NPPF; The imbalance of the housing strategy is demonstrated by the Council being required to deliver in excess of 1,100 dpa towards the end of the Plan period, being significantly in excess of the 693 dpa or any observable historic completion rates; This disproportionate reliance on such larger-scale and longer-term housing sites fails to address historic under-supply of housing, present rates of unaffordability and absence of a five year housing land supply meaning that the Plan cannot be considered justified as the most appropriate strategy when considered against reasonable alternatives; The evidence base underpinning the housing strategy comprises a Green Belt and Countryside Study which includes a range of Potential Development Areas (PDAs) in which development could be located without undermining the five principal purposes of the Guildford Green Belt;

• These PDAs include smaller and medium scale sites, such as land off Shere Road in West Horsley, which would be able to deliver housing in the shorter term to allow Guildford to reinstate a five year housing land supply and to immediately start addressing historic under-delivery and unaffordability;

• The Council has failed to adequately assess the full role that PDAs could play in delivering much needed short term housing supply by incorrectly and selectively applying a Green Belt sensitivity map as a finite constraint for certain sites located within wider, ‘high sensitivity’ parcels;

• This ‘macro scale’ Green Belt sensitivity map should not have been used by the Council to justify not assessing previously identified PDAs which were subject to much more robust, site specific assessment at a ‘micro scale’ which confirmed that their development would not undermine the Green Belt purposes of the wider parcel;

• Land to the west of Shere Road is one such PDA which is self-contained, visually and separately distinct from the wider ‘high sensitivity’ parcel and surrounded by existing urban influences such as the main A246 Epsom Road and housing;

• Land to the west of Shere Road was also assessed within the GBCS as being highly sustainable, the second most sustainable site in the Horsleys;

• By incorrectly applying the ‘macro scale’ Green Belt sensitivity map as a finite constraint for some sites and not others, for example Normandy / Flexford is located in a high sensitivity Green Belt parcel but is proposed for allocation for 1,100 new homes, the Council has developed an unsound housing strategy, unable to deliver sufficient housing over the early part of the Plan period;

• The Sustainability Appraisal recommends that the Council carefully considers options which could deliver in excess of OAN by up to 30% and has yet to test a scenario whereby PDAs surrounding existing villages deliver a higher quantum of new homes;

• By reassessing the potential for PDAs to deliver additional housing, the Council may also be able to consider whether they could assist neighbouring Authorities, particularly Woking Borough and the GLA, in delivering unmet need.

In order to be found sound, it is necessary for the LPA to revisit the housing strategy set out in the proposed submission draft Local Plan in order to increase the number of new homes deliverable in the earlier part of the Plan. This would ensure that the Plan is considered to be positively prepared, justified and effective by proactively addressing historic housing shortfalls as soon as possible, ensuring that a five year housing land supply is reinstated. Reducing or supplementing the focus on large-scale, strategic allocations which cannot come forward until the middle part of the Plan period due to associated infrastructure burdens would not only increase supply during the early years of the Plan, but would also allow
the Council to realise a more equitable spread of development across the Borough through the allocation of smaller and medium scale sites.

As with land to the west of Shere Road, West Horsley, there are a range of previously identified, sustainable PDAs which do not contribute to the five main purposes of the Guildford Green Belt and are of a scale that would allow their delivery during the early part of the Plan. We would urge the Council to revisit their evidence base and to consider whether there are PDAs, such as Dandara’s site, which offer an opportunity to deliver much needed, short term housing without undermining any of the strategic purposes of the Guildford Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  
- Land off Shere Road Site Location Plan.pdf (282 KB)
- GBCS Technical Note (Shere Road - West Horsley).pdf (1.1 MB)
- Representations to Proposed Submission Guildford Local Plan (July 2016).pdf (1.7 MB)
- GB Sensitivity Map (Shere Road - West Horsley).pdf (4.5 MB)

Comment ID: pslp172/2744  Respondent: 12062017 / Dandara Ltd (John Richards)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A38

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 These representations are submitted by Dandara Ltd in respect of targeted changes made to the Guildford Borough Proposed Submission Local Plan dated June 2017. A first draft of the Proposed Submission Local Plan was consulted upon during June and July 2016. Following receipt of consultation responses, alongside additional work on the supporting evidence base, the Council has made material changes to the document and are reconsulting specifically on these changes.

1.2 As advised by the Council, these representations will comment only on changes made to the 2016 version of the Proposed Submission Local Plan. They should therefore be read alongside and in conjunction with representations made by Dandara Ltd to the 2016 Proposed Submission Local Plan dated June 2016 and included alongside these additional representations for completeness.

1.3 Dandara Ltd are promoting land located to the west of Shere Road, south of the A246 Epsom Road and east of Wix Hill in West Horsley for residential development. A full description of the site is included in Section 3.0 of our original 2016 representations with a red line site location plan reproduced in Figure 1 below:

[Figure 1: Site Location Plan]

1.4 The majority of the site was identified as a Potential Development Area (PDA) within the Guildford Green Belt and Countryside Study (GBCS) under site reference E4-B and provided with an indicative capacity of 56 new homes. The site was also included within the Guildford Borough Land Availability Assessment 2016 (LAA) and provided with site ID 2175 ‘land to the south of West Horsley, Shere Road’ (n.b. error in our original 2016 representations giving LAA site ID of 2025). A full assessment of the GBCS and the identification of land to the west of Shere Road as a PDA was included in Section 4.0 of our original 2016 representations. Figure 2 overleaf refers:

[Figure 2: PDAs in West Horsley (South)]

1.5 These further representations will focus on specific changes made to the original 2016 Proposed Submission Local Plan as well as the supporting updated evidence base which includes:
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1232  Respondent: 12062017 / Dandara Ltd (John Richards)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

These representations supplement, and should be read alongside those prepared by Dandara Ltd for the 2016 Proposed Submission Local Plan.

They demonstrate significant deficiencies associated with the 2017 SHMA addendum which fails to identify full, objectively assessed need for market and affordable housing as required by the NPPF resulting in the Local Plan being unsound. Such deficiencies primarily focus upon excluding two years of housing need, being 2013-15 previously included within the 2015 SHMA, alongside over reliance upon 2016 post-Brexit economic forecasts which significantly divert from those used in the 2015 iteration with little interrogation or sensitivity testing of the inputs which is imperative given the uncertainties surrounding the Brexit process. The addendum also fails to apply an adequate housing uplift to positively address chronic affordability levels and rates of household formation suppression evident in Guildford alongside a rising student population.

The 2017 Proposed Submission Local Plan remains fundamentally unsound due to an over reliance on large-scale, strategic housing allocations which are unable to deliver housing until later in the Plan period due to associated infrastructure challenges. This has resulted in the Council being unable to reinstate a five year housing land supply following adoption of the Plan, exacerbating short term housing delivery pressures and increasing unaffordability. Furthermore, it has forced the Council to propose a staggered housing target within Policy S2 of the Local Plan which reduces housing delivery below OAN during the early years of the Plan putting additional pressure on immediate housing supply, affordability and household formation. This is entirely unnecessary and avoidable given the availability of a range of small and medium scale sites including Potential Development Areas (PDAs).

The 2017 Proposed Submission Local Plan recognises the desperate need to identify additional short to medium scale housing sites which can deliver new homes during the early part of the Plan period. This includes a commitment to reassessing all PDAs which were previously identified within the Green Belt and Countryside Study (GBCS) as not fundamentally contributing to the five NPPF Green Belt purposes. Despite the 2017 SA update acknowledging that there are sustainable options to deliver housing significantly above OAN, no serious assessment has been undertaken for PDAs and no additional PDAs have been allocated to boost housing delivery to meet objectively assessed need.

Taking land west of Shere Road in West Horsley as an example, the SA automatically rules out the PDA as a ‘given’ on the basis it was rejected by the 2016 Land Availability Assessment (LAA). However, the reason for exclusion in the LAA was that it was not considered to accord with the preferred spatial strategy, a spatial strategy which the SA update was tasked with reconsidering given a lack of short to medium term housing supply. It was also considered that the site fell within
‘high sensitivity’ Green Belt, albeit identification as a PDA clearly demonstrates the land as making no meaningful contribution to wider, strategic Green Belt purposes.

Finally, the Council attempt to suggest that the Horsleys cannot sustainably accommodate any additional housing numbers above those proposed for allocation in the 2017 Proposed Submission Local Plan. This is completely unevienced especially given that the 2016 iteration proposed an additional 138 homes for the Horsleys which have since been removed. If the Council consider that the Horsleys can only sustainably accommodate a finite number of new homes, especially given chronic short term need, this must be fully evidenced alongside consideration of whether any adverse impacts can be mitigated alongside future development.

The Proposed Submission Local Plan is fundamentally unsound by failing the ‘positively prepared’ test which requires objectively assessed development needs to be met, including need arising from neighbouring authorities. Neither can the Plan be considered ‘justified’ as the most appropriate strategy when considered against reasonable alternatives given the availability of small and medium scale PDAs which can assist the Council with meeting a chronic need for short to medium term deliverable housing. The Council must include additional short to medium term housing sites to be found sound, with PDAs shown not to contribute to the five main Green Belt purposes representing an available, deliverable and evidenced source of additional supply.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1237  Respondent: 12062017 / Dandara Ltd (John Richards)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2.0 Establishing Full, Objectively Assessed Housing Need

2.1 Para. 47 of the National Planning Policy Framework (NPPF) requires Local Authorities to boost significantly their supply of housing by using their evidence base to ensure that Local Plans meet full, objectively assessed needs for market and affordable housing in a housing market area.

2.2 The housing target within the 2017 Proposed Submission Local Plan has reduced from 13,860 over the period 2013-33 to 12,426 over the period 2015-34. This represents a - 1,434 reduction in housing numbers compared with the 2016 iteration. Para. 2.9 of the 2017 Housing Delivery Topic Paper explains that “this factual update has resulted in a reduced objectively assessed need for Guildford from 693 homes per year (2013-33) to 654 homes per year (2015-2034). Over the Plan period, this has resulted in a reduction of approximately 1,400 homes”.

2.3 The Council consider that the revised housing target of 12,426 over the period 2015-34 accords with para. 47 of the NPPF as representing full, objectively assessed housing need (OAN) as established by the 2017 addendum report to the original 2015 West Surrey Strategic Housing Market Assessment (SHMA). We consider that there are numerous deficiencies and inconsistencies contained within the 2017 SHMA which demand a reassessment of the OAN baseline.

SHMA Plan Period

2.4 The original 2015 SHMA considered housing delivery over the twenty year period 2013-33. The 2017 SHMA addendum explains at para. 1.2 that the Plan period has been rolled forward to 2034, “... to ensure that it covers a 15 year...
period from the point of adoption”. We have no objection to the Plan period being increased by one year to 2034. However, in parallel, and without justification, the start date of the Plan period has been brought forward by two years from 2013 (2015 SHMA) to 2015 (2017 SHMA).

2.5 No justification has been provided within the SHMA to explain why the Plan period, and thus the SHMA assessment period, has been brought forward to commence at 2015, covering a total of nineteen rather than twenty years. We consider that this approach is unsound for the following reasons:

(i) The 2017 SHMA addendum has effectively discounted two years of housing data that was previously assessed within the original 2015 SHMA as experiencing housing need of 693 dpa. The 2015 SHMA acknowledged that the OAN for the two year period 2013-15 was 1,386 homes (693 x 2) which was incorporated into the housing trajectory and five year housing land supply calculations for the original 2016 Proposed Submission Local Plan. The 2017 SHMA addendum has removed these two monitoring years with the only justification seemingly based on the unrelated requirement to extend the Plan period by a single year to 2034 (n.b. achieving 15 years post adoption). The effect of this is that two years of housing need experienced over the period 2013-15 have been removed from the emerging Local Plan, with any shortfall experienced effectively remaining unmet in perpetuity due to the Plan period now commencing from 2015;

(ii) Para. 3.3 of the 2017 SHMA addendum states that “the starting point is the base date for which up-to-date data is available on the Borough’s population and employment base”. However, this explanation does not justify why the SHMA base date of 2013 should be moved to 2015 with the loss of two years housing need data previously included in the 2015 SHMA. Planning Practice Guidance (PPG) is clear that “the 2012-2037 Household Projections were published on 27 February 2015, and are the most up-to-date estimate of future household growth” (para. 016, ref ID: 2a-016-20150227). The most up-to-date population and household projections published by DCLG which provide the starting point when assessing housing need therefore clearly covers the period 2013-15;

(iii) The 2017 Duty to Cooperate Topic Paper explains how Guildford Borough has worked with neighbouring HMA Authorities to prepare a joint SHMA. There is however no confirmation within the 2017 SHMA addendum that Waverley and Woking Councils have agreed to amend the SHMA assessment period from 2013-33 to 2015-34 which will fundamentally impact on the preparation of their requisite Local Plans. Guildford Borough should not unilaterally amend the SHMA assessment period without proper justification and agreement with partner Councils within the HMA. Para. 4.53 of the 2017 Duty to Cooperate Topic Paper recognises “whilst not fully consistent with the NPPF in relation to covering the entire housing market area, it [the 2017 SHMA addendum] nevertheless reassessed the HMA from a Guildford position …”.

2.6 The 2017 SHMA addendum contains no justification to explain why the housing need assessment period has been brought forward by two years to exclude the period 2013-15. Such a change would clearly benefit the Council by reducing the quantum of unmet housing need that has accumulated during the early part of the Plan period. This is a fundamentally unsound approach that exacerbates unmet housing need across the Borough, encouraging further worsening of affordability and suppression of household formation.

Demographic Projections

2.7 The 2017 SHMA addendum updates the 2012 ONS sub-national population projections (SNPP) and 2012 CLG household projections. As recognised by the PPG, “household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need” (para: 015, ref ID: 2a-015-20140306).

2.8 Starting with the ONS published SNPP, Table 3 of the 2017 SHMA demonstrates that population growth is projected to rise to a greater degree applying the 2014-based SNPP compared with the 2012-based SNPP. The up-to-date 2014-based SNPP suggests the population in Guildford will grow from 145,473 persons in 2015 to 167,126 persons in 2034, a rise of 21,652. This represents a population increase of + 2,271 when applying the 2017 SHMA addendum 2014-based SNPP compared with the earlier 2015 SHMA 2012-based SNPP.

2.9 Likewise, the SHMA addendum demonstrates that household numbers are also expected to rise to a greater degree applying the 2014 CLG household projections compared with the 2012 iteration. The up-to-date 2014 CLG projections suggest the number of households in Guildford Borough will grow from 56,843 in 2015 to 67,196 in 2034, a rise of 10,353.
This represents an overall increase in household numbers of +781 when applying the 2014 CLG household projections compared with the earlier 2012 version.

2.10 The 2017 SHMA addendum demonstrates that the 2014 based SNPP and household projections show a clear increase in population and household growth compared with the 2012 iteration which was the basis of the original 2015 SHMA. Following close interrogation of these changes, the 2017 SHMA addendum advises at para. 3.27 that “… we conclude that the 2014-based SNPP for Guildford Borough are technically sound”.

2.11 Whilst the 2014 based SNPP projects higher population growth than the earlier 2012 based iteration, interrogation of the ONS published 2015 mid-year population estimates (MYEs) suggests that the SNPP may be under-estimating growth. Whereas the 2014-based SNPP projected that the population of Guildford would grow by 2,515 persons over the period 2014-15, which itself was higher than the 2012 based SNPP, the MYEs suggest even higher growth at 3,122 representing a difference of +607 persons.

2.12 A consistent pattern therefore emerges of increasing population and household projection growth moving from the 2012-based SNPP and household projections to the 2014-based iterations and then sense checking against the 2015 MYEs.

2.13 It is recognised that the PPG allows for sensitivity testing of the demographic baseline with “… any local changes would need to be clearly explained and justified on the basis of established sources of robust evidence” (para: 017, ref ID: 2a-017-20140306). The 2017 SHMA addendum has therefore considered four alternative population growth projections as set out in Table 7 being:

(i) 2014 based SNPP;

(ii) 2014 based SNPP plus 2015 MYE;

(iii) 10 year migration period feeding into 2014 based SNPP;

(iv) 10 year migration period feeding into 2014 based SNPP plus UPC.

2.14 Looking at projected population growth, there is a very close correlation between scenarios (i), (ii) and (iii) with a difference of less than 750 persons over the period 2015 to 2034 (39 per year).

2.15 There is a similar pattern when the four SNPP based scenarios are converted into household need with scenarios (i) to (iii) all being very similar, projecting a change in household numbers over the period 2015-34 of between 10,350 and 10,849.

2.16 There is a clear discrepancy within the 2017 SHMA regarding the application of scenario (iv) which applies unattributed population change (UPC). Table 7, population growth, shows scenario (iv) as a clear outlier, being a significant 6,437 persons less than the closest next scenario whereas the difference between scenarios (i) to (iii) is less than 750 persons. A similar level of discrepancy is also evident within Table 9 which considers household growth. The 2017 SHMA addendum agrees that this scenario is unrepresentative, with para. 3.53 advising that “adjusting projections fully for UPC has been criticised by Planning Inspectors, is an approach which has been rejected by ONS and there is a lack of clear evidence that it can be fully attributed to an over-estimation of migration and to migration estimates over the period post 2005”. Para. 3.39 is more explicit:

“… this scenario needs to be treated with a degree of caution, it is based on population trends from 2005 onwards and is modelling what is potentially an extreme position where UPC is attributed in full to migration”.

2.17 The 2017 SHMA addendum concludes that “the 2014 SNPP adjusted for the latest MYEs would however represent an equivalent projection to that from which the demographic conclusions in the 2015 West Surrey SHMA were derived” (para. 3.54) with the recommendation that “at the present time, GL Hearn consider that using the latest official projections (including with adjustments such as 10-year migration trends) will provide the best estimates of future needs” (para. 3.77).

2.18 Whilst the conclusion to the 2017 SHMA addendum recognises that applying demographic scenarios (i) to (iv) would give a housing need range of between 521-584 dpa, averaging 552 dpa, it advises that the demographic evidence does not
justify deviating from the official 2014-based SNPP and CLG household projections due to there being “… no basis for adjusting recent demographic projections for UPC” (para. 8.6).

2.19 It is therefore evident that scenario (iv) should be excluded not only due to concerns regarding UPC raised within the report but also because the close correlation of scenarios (i) to (iii). We consider that scenario (ii) should form the basis of the demographic baseline for the Guildford Borough Local Plan given the robustness of the 2014-based SNPP coupled with ‘sense checking’ against actual MYEs. This would give an annual housing need of 577 dpa.

**Employment Growth**

2.20 The 2017 SHMA addendum has considered updated econometric forecasts published in late 2016 by Oxford Economics, Cambridge Econometrics and Experian. Despite applying the same methodology to calculate change in workplace employment – para. 5.9 of 2015 SHMA and para. 4.6 of 2017 SHMA addendum – there are significant differences in workplace employment between the two SHMA iterations which is the largest single contributor to the reduced housing target at Policy S2 of the 2017 Proposed Submission Local Plan.

2.21 Para. 4.7 of the 2017 SHMA addendum explains that “… AECOM calculate that workplace employment in Guildford between 2015 and 2034 is anticipated to grow by 12,893. This represents a reduction of 4,845 net additional jobs from the previous version of this calculation (17,738) issued in August 2015 …”. Whilst it is recognised that the Plan period has reduced from 20 years to 19 years, this still represents a dramatic reduction from 887 jobs per annum within the 2015 SHMA to 679 jobs per annum in the 2017 SHMA addendum. This represents a reduction in annual workplace job growth of 23%.

2.22 Despite this significant discrepancy between the 2015 and 2017 SHMA, there is little assessment of the cause of the reduction within the SHMA addendum itself and certainly no sensitivity testing looking at past workplace job growth trends. A summary of the principal changes contained within the 2017 SHMA addendum are explained within para. 4.40 of the 2017 Duty to Cooperate Topic Paper which states “the addendum sits alongside and supplements the West Surrey SHMA. It takes account of the latest population and household projections, the latest post-Brexit economic projections and the latest 2015 mid-year population estimate”.

2.23 The PPG advises that “Plan makers should make an assessment of the likely change in job numbers based on past trends and/or economic forecasts as appropriate …” (para 018, ref ID: 2a-018-20140306). Whilst we do not doubt that ‘Brexit’ will impact upon economic development and job creation, currently there is little certainty regarding the form that Brexit will take from an economic perspective including future trade arrangements with the EU and the rest of the world. In particular:

- Any economic forecasts published in late 2016 will have likely been influenced by the premise of a ‘hard Brexit’ which, following the general election and the failure of the Conservatives to secure a parliamentary majority, may be significantly paired back to ensure a majority is achieved on key votes in parliament;

- It is likely that any firm agreement on economic and trade terms will not be known for some time as negotiations prioritise the status of EU / UK nationals, costs associated with leaving the EU and the Northern Ireland and RoI border;

- There remains little clarity on how the post-Brexit trading relationship with the EU will be structured. A wide range of scenarios remain available from a complete break reverting to WTO rules to maintaining tariff and customs free access;

- There also remains little clarity on potential trade deals with non-EU countries and the impact or rebalancing this could have on economic growth and job creation in the UK.

2.24 We are not suggesting that Brexit should not be considered within economic and job creation forecasts but the 2017 SHMA addendum has solely based workplace employment growth over the period 2015-34 on late 2016 post-Brexit projections. This is particularly concerning not only due to inherent uncertainties regarding the terms of Brexit but also having regard to the significant reduction in projected jobs growth compared with the 2015 SHMA. We consider there to be five urgent workstreams required:

(i) The 2017 SHMA addendum must include significant interrogation of the three post-Brexit economic forecasts used to understand the assumptions they are making regarding Brexit. It is only through interrogation that it would be possible to
understand the terms of Brexit that the three forecasts are anticipating and to then consider these terms moving forward as detailed Brexit negotiations proceed;

(ii) In parallel, the differences between the economic forecasts contained in the 2015 SHMA and the 2017 SHMA addendum should be made clear to allow an assessment of the projected main impacts of Brexit on the Guildford economy. Clearly the economic impact of Brexit, assuming this was known, will differ depending upon the make-up of the economy and the extent of trade, labour and import / export links with the EU. As an example, para. 3.73 of the 2017 SHMA update notes that “Guildford sees a lower proportion of EU in-migrants than was the case at a regional / nation level. This would suggest that the migration impact of Brexit might be less in the Borough than other locations …”;

(ii) As with demographic projections, it is imperative that employment and job creation forecasts are sensitivity tested. As an example, it is unclear how the post-Brexit job growth forecast of 679 per annum compares against job growth figures over past recessionary and non-recessionary periods;

(iv) It is important that there is no double-counting regarding the potential impact of Brexit between demographic projections and economic forecasts. For example, para. 3.23 of the 2017 SHMA addendum notes that the 2014-based SNPP projects net international migration to the UK falling from 329,000 in 2014/15 to 185,000 by 2020/12 which is likely to take into account changing EU migration levels associated with Brexit;

(v) It is imperative that the post-Brexit reduction in jobs is considered alongside the objectives of the M3 LEP as well as economic policies contained within the 2017 Proposed Submission Local Plan.

2.25 We strongly consider that the approach of the 2017 SHMA addendum to projecting future workplace jobs growth is unsound being based upon narrow post-Brexit forecasts with no critical assessment or sensitivity testing considering both the inherent uncertainties of the terms of Brexit and the large discrepancy between the 2015 SHMA and 2017 update. Box 6.7 of the SA recognises the impact that this has had on the overall Local Plan housing target “the addendum finds a need for a very small uplift of just 2 dpa, which is a considerable deviation from the SHMA 2015 (120 dpa). This is primarily because updated employment forecasts (from Nov / Dec 2016) are lower …”.

2.26 When looking at potential uplifts to the demographic baseline to support economic growth and job creation, para. 4.26 of the 2017 SHMA addendum explains that “the 2014-based SNPP scenarios would support between 12,700 – 12,800 jobs …”. Whilst this closely aligns with the post-Brexit 2016 economic forecasts used within the 2017 SHMA addendum, it is evident that it is significantly below the 17,738 jobs projected within the 2015 SHMA.

2.27 There is a real risk that even if one takes a mid-point between the post-Brexit 2016 projections and the original 2015 SHMA projections, there would be a significant shortfall in housing delivery to support projected jobs growth. This would result in economic growth being stifled by lack of housing supply resulting in exacerbated levels of in-commuting, housing price rises (including rental) and decreasing levels of affordability. We therefore consider that an uplift significantly larger than the paltry 2 dpa proposed above the demographic 2014-based SNPP plus MYE of 577 dpa is required to support economic growth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Answer (if comment is on questions 1-7 of the questionnaire): ()

Introduction

On behalf of our client, Mr Kevin Soobadoo, we submit representations to the Guildford Borough Council Proposed Submission Local Plan (Regulation 19) consultation. Our representation relates to the proposed amendments to the Green Belt boundary at Flexford which affect our client’s property, ‘Westholme’, Green Lane East. A site location plan is attached (see Enc.1). Photos of the site and surroundings are attached (see Enc.2).

We are surprised by the removal of the site from the inset boundary as it had previously been included in the Preferred Options proposals map. Similarly, we are also concerned about the way in which the inset boundary for Flexford has been assessed in the Green Belt and Countryside Study (Volume IV).

Based on national planning policy, and the methodology used by the Council, we consider that the property should be removed from the Green Belt and be included within the revised inset boundary for Flexford.

National Planning Policy

We acknowledge that the Council has made clear reference to Section 9: Protecting the Green Belt (paragraphs 79-92) of the National Planning Policy Framework to assess the Green Belt. Paragraph 79 states that ‘the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and permanence’.

The NPPF goes on to state that ‘Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan’ (paragraph 83). ‘When drawing up or reviewing Green Belt boundaries, local planning authorities should take account of the need to promote sustainable patterns of development’ (paragraph 84).

In addition, paragraph 85 states that ‘when defining boundaries, local planning authorities should:’

- Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- Not include land which it is unnecessary to keep permanently open;
- Where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longerterm development needs stretching well beyond the plan period;
- Make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a local plan review which proposes the development;
- Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
- Define boundaries clearly, using physical features that are readily recognisable and likely to permanent.’

Critique of the Methodology

We consider that the bullet points highlighted bold under paragraph 85 (above) are most relevant to redefining the Green Belt boundary as the other four purposes relate to more strategic matters. However, the newly proposed western extension of the inset boundary (north of Green Lane East and west of Westwood Lane) fails to identify land that achieves these two key purposes. The alterations are therefore inconsistent with national policy as required under NPPF paragraph 182.

To demonstrate our concerns, we have analysed the robustness of the three stage methodology used to assess the contribution in which the open character of a village makes to the openness of the Green Belt.
Stage 1: Assessing the degree of openness within each village through analysis of village form, density and extent of existing developed land

We understand that the purpose of stage 1 was to map the detailed locations of developed and open areas and determine how they relate to the openness of the wider Green Belt. Through site survey and aerial imagery, it was identified that the Local Plan (2003) settlement boundary did not represent the entire village area and that development extending beyond the settlement boundary could be perceived as being part of the same village. It was considered appropriate to map the ‘extent of the perceived village area’ including areas of development located outside of the adopted Local Plan settlement boundary that were reasonably considered to be part of the same village.

However, having reviewed the stage 1 map for Flexford, we have identified that it fails to include ‘Westholme’ in the extent of the perceived village area. Given that all properties along (and accessed via) Green Lane East, except ‘Westholme’ have been included in stage 1, we consider that it would be inconsistent not to include it. As a result, we have categorised ‘Westholme’, as medium density development. This is based on there being several buildings within a medium scale garden plot and that the level of density is comparable to dwellings earmarked at 1G on the Stage 1 map for Flexford.

Our assessment of the level of development has been prepared using the density definitions detailed in paragraph 13.13 of the Green Belt and Countryside Study (Volume IV). We have created an amended stage 1 map to illustrate our interpretation of the perceived extent of the village area and edited the description under 1G (see Enc.3). We consider this to be a much more consistent approach.

Stage 2

The purpose of stage 2 was to survey the extent of defensible Green Belt boundaries within each village.

Paragraph 13.17 of the Green Belt and Countryside Study (Volume IV) states that ‘if land is physically enclosed by topography and/or vegetation there would be little opportunity to observe the land in question, and little opportunity to perceive how such land could significantly contribute to openness in Green Belt terms, thus limiting its opportunity to contribute to the openness of the area to any significant degree or attach any sense of importance’.

It continues by suggesting ‘that in these circumstances...the land will be unable to make an important contribution either literally or perceptually, and therefore can be argued as unnecessary in designation terms and could justifiably be excluded from the Green Belt in accordance with the NPPF’.

For a village to be potentially inset within the Green Belt, it would need to be demonstrated that recognisable, defensible and permanent Green Belt boundaries could be provided that would endure in the long term. Paragraph 13.19 states that ‘recommended boundaries include treebelts, woodlands and hedgerows...such features are clearly recognisable, and with regards to permanence will often be in place as long as, if not longer than, much built development’.

Having reviewed the map for stage 2, we note that the tree belt that makes up the northern boundary of ‘Westholme’ is illustrated. These are dense, coniferous trees and approximately 10m in height. However, the map fails to recognise the permanent hedgerow along the western boundary. To demonstrate this, we include on-the-ground photographs of both the western and northern boundary (see Enc.2).

This images provide appropriate evidence that the property has a permanent and recognisable, defensible boundary along the northern and western perimeter and is therefore in accordance with the way in which Green Belt boundaries should be defined under NPPF paragraph 85. There is therefore no reason why the revised inset boundary should not include ‘Westholme’ in defensible boundary terms.

We have also prepared an amended stage 2 map highlighting the hedgerow along the western boundary (see Enc.4).

Stage 3

We understand that the purpose of stage 3 was to assess the suitability of each village, as a whole, to be inset from the Green Belt. Whilst the village of Flexford is proposed to be inset from the Green Belt, the proposed inset boundary does not reflect the requirements of NPPF paragraph 85 as it continues to include land which is unnecessary to be kept permanently open and does not follow clear, defensible boundaries.
We therefore raise concern about the newly proposed boundary at section 3E illustrated on the map for stage 3. The map states that the village was considered suitable for inserting within the designated Green Belt due to ‘hedgerows and treebelts to the west of Westwood Lane between Green Lane East and the railway line’. However, if the revised boundary were to follow hedgerows and treebelts to the west of the village, then ‘Westholme’ should be incorporated into the insetting of the boundary. This is based on the defensible boundary along the northern and western boundary illustrated on map 2 (see Enc.4).

Furthermore, ‘Westholme’ does not contribute to the openness of the Green Belt. The reasons are as follows:

- The large, mature and dense conifer trees along the northern boundary prevents the land from contributing to the openness of the Green Belt to any significant degree or attach any sense of importance all year round (see Enc.2);
- The western side of the property is narrower than the eastern side. This means that there is less open land which contributes to the openness of the Green Belt (see Enc.2); and
- The land as a whole is surrounded by development - A temporary traveller pitch is located to the north of the property, ‘Tollerton’ is situated to the west and there is high density housing running along the eastern and southern boundaries. The property is not visible from the open part of the Green Belt to the north west (see Enc.2).

It is evident from our research that ‘Westholme’ is surrounded by a clear, defensible boundary and that it does not contribute to the openness of the Green Belt. With properties up to ‘Roffey’ on Green Lane East proposed for inclusion in the insetting boundary, the inclusion of ‘Westholme’ would not result in an irregular anomaly protruding into the Green Belt. It would instead align with ‘Roffey’ to form a clearly defined and logical edge to the revised inset boundary.

We have prepared an amended version of the stage 3 map to illustrate this (see Enc.5).

Inclusion of ‘Westholme’ within Preferred Options Consultation

We have also reviewed the previous consultations and note that ‘Westholme’ was proposed to be inset from the Green Belt boundary in the Preferred Options version of the Plan. However, it no longer appears in the Submission Version of the Local Plan, presumably due to the removal of land to the north east of Green Lane East as a proposed site allocation for four traveller pitches.

However, the inclusion of land to the north east of Green Lane East should not have been a contributing factor in determining whether ‘Westholme’ be inset from the Green Belt. This demonstrates that the Council has reviewed the evidence base for Flexford, particularly the map at Stage 2, and concluded that there is a clear defensible boundary to the north of the site (refer to 2L – hedgerow between Westwood Lane and the railway) and does not contribute to the openness of the Green Belt.

Proposed amendments to policy wording

Following our review of the Submission Local Plan, our client is concerned that the Submission Local Plan is unsound for the following reasons:

The Green Belt and Countryside Study (Volume IV) fails to present the most appropriate strategy for a newly revised inset boundary at Flexford. The Proposals Map for Flexford is therefore not justified.

The newly revised inset boundary at Flexford fails to meet the criteria for defining Green Belt boundaries under NPPF paragraph 85. The Proposals Map for Flexford is therefore inconsistent with national policy.

We request the following amendments are made to the Local Plan:

Redefine the western extension of the Flexford inset boundary as shown on our version of the stage 3 map.

Amend the Proposals Map to accompany Policy P2 - Green Belt.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [Enc 2 - Westholme Photographic Study 2016_07_18.pdf](#) (3.3 MB)
[Westholme Representations to Guildford Local Plan (including Enc1_3_4_5).pdf](#) (6.2 MB)

Comment ID: SQLP16/1907  Respondent: 12108513 / Caroline Wilberforce  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

Examination in Public
We wish to appear at the forthcoming Examination in Public to present our case on this matter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/977  Respondent: 12124385 / P Davie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Re Local Plan

I write to object to Guildford Borough’s Draft Local Plan as detailed below. Please show my comments to the Planning Inspector who will decide about the Local Plan. Please also acknowledge receipt of this letter.

1. General Evidence and Policies
   1. Housing Requirement: I OBJECT to the figure of 693 houses required per annum as being too high. Guildford Borough Council will not publish any details regarding how this figure was derived or to support it. It is therefore impossible to support the sudden increase in housing plans from previous years figures of 322.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### General Policies relating to Send Parish. Sites (A42, A43, A43a, A44)

1. **Send Removal from Green Belt**: I OBJECT to removal of Send from the Green Belt as this will remove part of the necessary buffer between Guildford and Woking, increasing the risk that a large conurbation will form. There are no exceptional circumstances that justify the removal.

2. **Building on Current Green Belt land**: I OBJECT to the proposed development sites current Green Belt sites at Clockbarn Nurseries, Garlick’s Arch, and Send Hill since there are no special or exceptional circumstances which justify removal of their Green Belt status.

3. **Due process**: I OBJECT to the proposed development sites at Clockbarn Nurseries, Garlick’s Arch, and Send Hill since they were not included in the previous Draft Local Plan consultation exercise in 2014. Send sites were all substantially changed without the proper two-stage process of consultation being followed, unlike the rest of the Guildford Borough.

4. **Traffic levels and associated environmental issues**: I OBJECT to the proposed Burnt Common interchange that will increase both traffic movement levels through the Parish and the level of traffic related pollutants over wide areas in the Parish.

5. **Housing Numbers**: I OBJECT to development of sites at Clockbarn Nurseries, Garlick’s Arch, and Send Hill since the number of houses proposed (485 + 2 traveller pitches) will increase the number of houses in Send by 25% which is incompatible with maintaining Send’s current rural nature.

### What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Attached documents:**

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### b. Garlic’s Arch and Burnt Common Interchange (site nos. A43 and A43a)

1. **Outside current development boundary**: I OBJECT since this development lies outside the existing housing outline of the village, and should therefore be deleted to avoid both loss of green belt land and creeping development between Send, Woking, and Guildford.

2. **Traffic Infrastructure Capacity**: I OBJECT to the proposed new interchange onto the A3 at Burnt Common since this would generate significant new traffic movements that surrounding roads cannot accommodate.

3. **Traffic Infrastructure Evidence**: I further OBJECT to the proposed new interchange onto the A3 at Burnt Common since associated transport evidence is incomplete and does not justify additional A3 access at this location.
4. **General Infrastructure**: I OBJECT to development at Garlick’s Arch for 400 houses as there is insufficient infrastructure to support the development, including utilities, social amenities, schooling, public transport, and medical facilities.

5. **Industrial use**: I OBJECT to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is not a sustainable development. It is removed from the major population centres in Guildford and Woking necessitating a large increase in public transport services and/or major additional traffic movements for staff travel and business logistics. If there is a need for 7,000 sq m of industrial space within the Borough it should be located at Slyfield where there is a 40ha site available and where it would be largely welcomed.

6. **Flooding**: I OBJECT to development at Garlick’s Arch. This area is classified by the Environment Agency as being in a higher flood risk area than the Council’s own assessment and has flooded many times in recent years. Therefore the Council’s own assessment is invalid and the site must not be developed.

7. **Environment**: I OBJECT to the destruction of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID**: PSLPS16/1482  **Respondent**: 12124385 / P Davie  **Agent**: P Davie

**Document**: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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3. **Specific Sites**

   1. **Send Hill (site no. A44)**
   2. **Site Access**: I OBJECT since this development will increase traffic along Send Hill. This is a very narrow road (or lane) that, for one third of its length, permits only single file traffic. Any increase in traffic volumes must increase the risk of accidents. I have already witnessed several occasions where two cars only just missed hitting each other (i.e. coming head to head). I personally avoid using this road due to the perceived risk of a serious accident. In addition the junction between Send Hill and Potters Lane is hazardous, due to poor sight lines, with numerous accidents observed.
   3. **Flooding**: I OBJECT since part of the site comprises a bowl formation that has flooded most winters for many years. This, together with a large pond on adjacent land, indicates a high water table in this area. Any disturbance to the site would possibly alter the water table thus causing flooding to adjacent properties.
   4. **Site Contamination**: I OBJECT since Guildford Borough Council used the site as a refuse tip/landfill site for many years. The site is therefore unsuitable for development on health grounds.
   5. **Site Over development**: I OBJECT since the site is too small for the proposed uses.
   6. **Outside current development boundary**: I OBJECT since this development lies outside the existing housing outline of the village, and should therefore be refused to avoid both loss of green belt land and creeping development between Send, Woking, and Guildford.
   7. **Increased demand on village services**: I OBJECT since this proposed development will add additional houses to the existing village stock, thereby increasing demands on existing village services, e.g. schools and health services. These are already recognised as being oversubscribed. Any development, which further increases demand, must be deferred until after additional investment by the Borough/County has increased their capacities.
   8. **Loss of amenity**: I OBJECT since the site has been used as a public open space for many, many years. It is understood the timescale is such as to confer the formal status and protection of Public Open Space status to the site, which then prohibits development.
9. **Loss of amenity:** *I OBJECT* since the site is part of the rural nature of this part of Send. Adding houses, and associated access/service roads, will detract from this setting, be visible for long distances, and will adversely alter the character of the area. In particular, scenic views to and from the River Way and St Mary’s Church will be adversely impacted

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3244   Respondent: 12124385 / P Davie   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

b. **Building on Current Green Belt land:** *I OBJECT* to the proposed development of current Green Belt sites at Clockbarn Nurseries, Garlick’s Arch, and Send Hill since there are no special circumstances which justify removal of their Green Belt status.

c. **Process:** *I OBJECT* to the failure of Guildford Borough Council to identify sufficient brownfield sites within existing urban areas that should be targeted for development before the open countryside and the Green Belt.

d. **Process:** *I OBJECT* to the failure of Guildford Borough Council to include the Town Centre Masterplan 2015 within the overall Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/4041   Respondent: 12126209 / Ray Gross   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing with regard to the local plan and am acting for the owners of a plot of land in West Horsley/Ockham. In your previous consultations, we proposed the inclusion of this plot as a potential development site but it was not added. From reviewing the sites that are currently proposed, we still believe that ours has significant advantages over many of those proposed. In particular, it is on one of the main roads through the villages and so it has immediate access to the road network without the addition of additional infrastructure. It is also opposite the houses on Ockham Road North and so residents are used to this aspect as they enter the village.
I attach the original estate agent particulars and am referring to Plot 1 which is 7.85 acres in size (approximately 3 hectares). We would ask that you reconsider this plot with a view to including it in the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 📄 Horsley_Land.pdf (6.1 MB)

<table>
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<tr>
<th>Comment ID: PSLPA16/4538</th>
<th>Respondent: 12136289 / Martin Digby</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Flawed evidence is exaggerating the need for expansion as shown clearly by the GRA report on housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Expansion should be constrained to protect the character of town and country in our congested gap town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Transport evidence is not yet fit for use and major transport issues are unresolved eg another river crossing, a central bus facility.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18642  Respondent: 12136289 / Martin Digby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Allowing Green Belt development to pay for transport schemes will simply generate yet more traffic from more homes, fuelling congestion.

I oppose unjustified Green Belt development.

It is irresponsible to squander every last resort greenfield site in a single Plan, robbing future generations.

Brownfield opportunities are being ignored – we need homes in the centre (not 40% more shops), much more accommodation on campus for students, and homes for the elderly to free up family houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18641  Respondent: 12136289 / Martin Digby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
It is unacceptable that, unlike other places, Guildford is choosing not to constrain its overall housing growth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/330  Respondent: 12191873 / Rob Woof  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A42 Clockbarn Nursery in Tannery Lane  Flooding is a concern on this site, as it has been flooded in the past. It would also increase traffic along the narrow lane which is already under stress from existing traffic flows. There is no mention of plans to improve or widen Tannery Lane or its junction with the A247

Site A43 Garlick’s Arch will add 400 homes and 7000 sqm of various types of employment space as well as a new 4-way junction for the A3 which is need to enable development of the sites at Gosden Hill and Wisley. This site presents a significant change from the Regulation 18 consultation in 2014, where it was never mentioned or considered - this is a massive change at very late notice. The impact on local services and infrastructure by residents of 400 new homes and additional HGV traffic will be huge and no mention is made of this nor any mitigations

Site A44 Land at Wind’s Ridge and Send Hill, This is, like Garlick’s Arch, is a new addition to the LP and has not been seen before by residents. No consultation has been made - GBC has simply made a proposal, more likely with developers than residents. Anecdotal evidence suggests this site has previously been a landfill site and not suited to the proposed development

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/699  Respondent: 12191873 / Rob Woof  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Recent developments in Send have clearly targeted the affluent commuter and are well beyond the reach of local residents, causing the break-up of family units as our children cannot afford a home in Send when they leave the family home. The Local Plan is targeting 40% of all new homes to be affordable housing but as Send is not exempt from the right to buy, affordable housing cannot automatically be secured in perpetuity. So that affordable housing will continue to meet local needs it should be allocated to people with a local connection to the parish (through residence, employment or close family), followed by those with a local connection to adjacent parishes within the borough who meet the criteria, and finally those with a connection to the borough of Guildford. The homes should not be affordable only to those who commute to jobs in London and have no connection to the community of Send or local employment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/700   Respondent: 12191873 / Rob Woof   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Under this policy Send will be removed from the Green Belt which means that all areas within the settlement boundary will no longer be afforded Green Belt protection. The GBC suggest that exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed. I do not agree that these exceptional circumstances have been proved in the case of Send, when many suitable brownfield / non Green Belt sites remain for consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/697   Respondent: 12191873 / Rob Woof   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The GBC survey totals 10395. This annual number is higher that the number which originally raised concern during the 2014 consultation and so it seems that the figure has been raised despite objections and revised evidence. The sites in or adjacent to Send will delivery almost half of this number. The Garlicks Arch proposal was added very late, without any local engagement and without any time for consultation to take place at any level in the drafting of the plan, which I think is unacceptable and undemocratic, denying meaningful consultations with residents in a timely fashion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I am writing today with some objections to the proposed local plan.

In particular, I object to the density of new housing in the Send area over the next 15 years. I believe that this will damage the rural feel of Send and surrounding areas and the infrastructure in place is not adequate to sustain this increase. I do however support the development of the Wisley airfield area as this would allow for families that live and work in the London/ M25 corridor to travel without having an impact on the A3/ local send roads area. (Number of houses – The GBC Spatial Strategy which plans delivery of 693 homes per year from 2018 for 15 years totaling 10395. This annual number is higher that the number which originally raised concern during the 2014 consultation. The sites in or adjacent to Send will delivery almost half of this number. (reference Policy S2 on page 26**)

I object strongly to the removal of Send from the Green Belt area. I believe this will cause an unacceptable build up in the area and again destroy the rural feel of the area (Village will be Inset from the Green Belt – Under this policy Send will be inset from the Green Belt which means that all areas within the settlement boundary will no longer be afforded Green Belt protection. The GBC suggest that exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed. (reference Policy P2 on page 48**)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I don’t object to the building of houses over the Wisley airfield, provided they get their own junction onto the M25 and not onto the A3 which is already too busy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<table>
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<th>Comment ID:</th>
<th>PSLPS16/5934</th>
<th>Respondent:</th>
<th>12210849 / Jason Doran</th>
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I also completely object to the creation of a Traveller Site on Send Hill. This would be [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature] (unless you built a Police Station on the same site!). The area in question is regularly used as open space for children to play in (off the road and out of their houses) and is also used by Dog walkers and local people who want to enjoy the outdoors. [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature] There are any number of more suitable places for a traveller site, for instance next to some of the industrial areas or Social housing.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<table>
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Full support is given to the allocation of land to the south and east of Ash and Tongham as part of the strategic development area set out in Policy A46. This area and specifically land to the west of The Street and Grange Road, Tongham has much to commend it:

- The area is long recognised as the most sustainable location in the Borough after Guildford;
- It is unconstrained by environmental designations;
- It lies in the area designated as ‘Land Beyond the Green Belt’;
- It has access to the strategic road network, specifically the A31 Hogs Back and A331 Blackwater Valley Route;
- Opportunities exist through sensitive design at the site boundaries to have regard to the transition from urban to rural; provide integrated green infrastructure enabling connectivity of spaces and habitats between land parcels; and provide sufficient SANG land for the needs of development cross boundary.
Notwithstanding this, the provision of SANG in conjunction with development proposals coming forward within this strategic location should also be incorporated within the policy, specifically SANG proposals on land at Tongham Road, Runfold which will provide mitigation for residential development on land to the west of The Street, Tongham as well as additional development within the strategic development site and cross boundary into Waverley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

- Residential and SANG Location Plan - manor Farm - 2016 07 15.pdf (624 KB)

Comment ID: PSLPP16/16920  
Respondent: 12316001 / Vail Williams LLP (Jane Terry)  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H1: Homes for All requires new residential development to deliver a wide choice of homes to meet a range of accommodation needs as set out in the Strategic Housing Market Assessment and should provide a mix of housing tenures, types and sizes appropriate to the site size, characteristics and location. The policy confirms the Council’s support for the provision of specialist forms of accommodation in appropriate sustainable locations and makes specific reference to some of these (students, travellers and HMOs). However the list is not exhaustive and by emphasising some and not others (for instance Custom and Self- build housing) there is a lack of clarity as to what the policy is actually seeking.

The reasoned justification in support of the policy, does refer to Self-build and Custom housebuilding at paragraph 4.2.12 but again, simply refers to having regard to the information on the register when carrying out … planning functions. It is also very broad brush in relation to making provision for Custom and Self- build only at the 4 strategic sites and unspecific in terms of the quantum sought.

It is very important that the Policy and Justification is completely clear on Self Build. It is growing in popularity across the country and in expensive areas will be one of the most affordable ways of getting on the housing ladder. Guildford Borough currently has new builds selling from £500-£700 per square foot with build costs around £160 per square foot. Self-builders qualify for exemption from CIL and government guidance on multi unit Schemes suggests that applicants should consider applying for a phased planning permission. With the relatively high rate of CIL proposed for the Borough this could become a very attractive proposition to landowners looking to increase their returns over what the housebuilders might typically pay for their land. At least some financial modelling should be undertaken to inform the Council’s precise policy and the potential impact for demand for multi unit self-build schemes that could technically avoid CIL contributions.

Without amendment to the reasoned justification the Council’s position is not clear. Would they support Self-build schemes on other allocated sites? If the council would not support Self Build schemes on other allocated sites then it is felt that the existing policy and wording is very restrictive and limits choice.

The Government have been very clear in their message and recent changes to legislation that they want to encourage the self build market as they see it contributing greatly to the country’s housing shortage whilst also helping the many smaller builders. Many councils have been very positive in their approach to self-build and in expensive areas like Surrey it is likely to become a very popular way for many to get on the property ladder. We consider that Guildford’s guidance is currently lacking in respect of self-build and would ask that this is reviewed prior to submission of the Plan to the Secretary of State.

The Council’s previous response to the Reg. 18 consultation stated that:
“Any site that is suitable for market housing is also suitable for self-build or custom housebuilding as this type of housing falls within the same planning C3 use class category”.

However, the justification in local plans also acts as guidance to the policies. In relation to Policy H1, the guidance indicates that self-build plots will (only) be allocated at the four strategic sites listed above.

In order to be completely clear about the council’s Self-build policy and the options available to self-builders and land owners alike it is considered that the reasoned justification at paragraph 4.2.12 should be amended to give clarity to this intent.

Additional comments on the adequacy of the Council’s approach to discharging its duty on Custom and Self-build are set out in the preceding paragraphs, in answer to Questions 1-3 of the Council’s questionnaire.

Accordingly we are seeking 2 key changes to the Plan in relation to Custom and Self-build:

1. A change to Policy H1 to specifically relate to Custom and Self-build;
2. A change to the reasoned justification at paragraph 4.12 in relation to Custom and Self-build; and
3. The specific allocation or safeguarding of one or both of our clients sites at Send specifically for Custom and Self-build to satisfy the demand in the early stages of the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Proposal for a bespoke SANG straddling the administrative boundary between Guildford and Waverley Borough Councils have been submitted within the planning application for residential development in line with Policy A46 to the east of The Street, Tongham. This is a bespoke SANG which is intended to provide for the mitigation requirements of residential development to the south of Tongham (Policy A46). However it also provides additional mitigation capacity for further residential development within a 5km catchment area and is well placed to provide mitigation for the rest of the Policy A29 strategic development area.

The SANG proposal does not appear in the Guildford Infrastructure Delivery Plan as either a strategic SANG or bespoke SANG. Rather, SANG provision is set out in the Infrastructure Delivery Plan with Policy A29 development being allocated solely to the Russell Place Farm SANG whose 5km catchment in any event does not cover the whole of the A29 strategic development area. Recognition should be given to the Tongham Road SANG which will provide the appropriate SPA mitigation and which, following the submission of further details as to the delivery plan, is now expected to receive the support of Natural England. This SANG will also provide additional capacity and flexibility to deliver the necessary mitigation to other sites within the strategic development area as well as those coming forward in Waverley Borough. Its inclusion in the Plan will enhance resilience of the Plan by ensuring much needed residential development is not delayed through non-delivery of either the Russell Place or Ash Lodge Drive SANGS.
Do you agree that the evidence used for the draft Local Plan: Strategy and Sites is adequate, up-to-date and relevant?

No.

We do not consider that the Green Belt and Countryside Study has adequately assessed the Potential Development Areas (PDA’s) it identified in relation to how those PDA’s fulfilled their greenbelt purposes. The Council has carried out Greenbelt purpose assessments on the larger land parcels and has placed an over reliance on these assessments to inform their spatial strategy. As a result the Council has removed many of the more Sustainable village infill sites between the Reg 18 and Reg 19 draft based on what land parcel they happen to fall within.

The Land Availability Assessment (LAA) has a list of sites that it has discounted for various reasons. There seem to be only two sites on that list that have been considered and discounted as potential dedicated Custom and Self Build sites. We do not feel this is an adequate amount of sites considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We do not consider that the Infrastructure Deliver Plan is adequate in relation to the provision of suitable or sufficient SANG.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1860  Respondent: 12316001 / Vail Williams LLP (Jane Terry)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant?

No.

We question whether the councils proposed Policy H1 “Homes for All” has full regard to National Policy and Guidance in relation to Custom and Self-build homes. The policy H1 makes no specific reference to Custom or Self-builds and there is limited detail in the reasoned justification under para 4.2.12 which focuses on keeping a Self-build Register and the allocation of some self-build plots within the strategic housing development sites. This is the duty imposed on local planning authorities set out in the Self-Build and Custom Housebuilding Act 2015. There is now also a duty placed on local planning authorities to grant planning permission for enough serviced plots of land to meet demand for self-build and custom house building arising in each base period. Regulations are yet to specify the detail and it is early days in terms of people becoming aware of, being interested in and taking up the opportunities of the provisions. Whilst some provision is made within the Plan within the strategic housing sites, there is no monitoring indicator for this type of housing, nor any reference to targets. In order to ensure that the duty to meet demand and to grant permission is adequately addressed, it is considered that further work needs to be made within the Plan through adding an indicator and target but also ensuring that adequate sites of suitable character are allocated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1902  Respondent: 12316001 / Vail Williams LLP (Jane Terry)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
No.

We do not consider the Plan to be compliant with the national policy set out in the NPPF in relation to the provision of suitable and sufficient SANG as required by the Habitats Directive.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1861  Respondent: 12316001 / Vail Williams LLP (Jane Terry)  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is sound?

No.

To meet the Test of soundness, the independent Planning Inspector is required to consider if the local plan has been positively prepared, is justified and effective and is consistent with national policy. These points are considered below.

Has the plan been positively prepared?

In respect of the policy concerning the Custom and Self Builder we do not feel that the plan has been positively prepared for the following reasons;

It would seem that proposing to allocate some plots solely on the four large strategic sites is restrictive to the Custom Builders’ choice and therefore cannot be considered positive. Many custom builders would like an alternative setting to the plots on offer within the large strategic sites and making these available through a variety of smaller sites would comply with national policy through the NPPF to secure housing choice and would be a positive policy.

The Government is very keen to promote the Custom-build route for the aspiring house owner as it is hoped it will contribute greatly to housing numbers as well as employing many of the smaller builders. The Government have been working closely with a handful of councils (known as vanguard councils) to promote the Custom-build market and it is felt that many of their initiatives will be rolled out across the UK. Many Councils across the country have allocated whole dedicated sites for the Custom-build market.

We therefore do not feel that the draft plan has taken into account the Governments’ clear policy on custom and self-build housing as set required in the Housing and Planning Act 2016, Practice Guidance and the Housing Strategy for England.

Chapter 59 of the NPPF states that the SHMA should assess the need for all types of housing for the different groups in the community including people wishing to build their own homes.

The West Surrey Joint SHMAA of Sept 2015 did consider the issue of Custom-build Homes on page 157 however the findings were contradictory and inconclusive and using the information from this source must now be considered out of date when compared to the Councils own Custom and Self Build Register. It is this relatively new register that should be used to inform the Plan through to its final stages.
The Reg. 19 Local Plan Strategy and Sites document now specifically identifies some self-build plots within the strategic development sites but as noted, makes no reference to quantum, monitoring indicator or target leaving it to be resolved at a later date through the strategic sites. This is not considered adequate.

**Justified**

Again in relation to Custom and Self-build, it is not considered that the Plan represents the most appropriate strategy when considered against reasonable alternatives. As referenced above, we consider that the Plan relies too heavily on the four strategic sites, which in turn rely heavily on central Government infrastructure funding to move forward. The strategic sites will start to come forward towards the end of the Plan period and therefore suitable provision should be made for Custom and Self-build which can be delivered earlier in the Plan period through smaller bespoke sites. A reasonable alternative would be to consider smaller/medium sites as a more appropriate deliverable strategy.

The Greenbelt and Countryside study (GBCS) identified many smaller/medium potential development sites and assessed these against environmental constraints and sustainability criteria. The Study scored potential sites and gave them a sustainability ranking intended to assist in reducing the number of traffic movements and is considered the most justified approach in line with the NPPF’s approach to sustainable development.

Parish Councils could understand the logic and when consulted on The Vineyard site (site 41) in Tannery Lane, Send (Site 41) the parish council stated; ‘it is the most sustainably located near to existing shops, schools and public transport. Sites 56, 57 and 58 are not within easy walking distance of shops and schools in either Send or Ripley and would be certain to generate significant traffic movements.’

The Green Belt and Countryside Study also carried out a Green Belt sensitivity analysis on all land parcels across the Borough. This study is considered to be a more subjective study and has come in for considerable criticism in relation to its methodology and conclusions. It is a very broad brush approach which rejects our clients potential development area PDA B16-A village infill site of 5 acres on the basis that the 500acre land parcel it sits in has been subjectively assessed as being highly sensitive. This approach unnecessarily sterilises much of the Borough’s small/medium village infill sites for the length of the plan quite often depending on which side of the road they are.

We consider that the final selection of sites for allocation has given too much weight to the classification of large land parcels to the determinant of sustainability criteria. This has resulted in many of the most sustainably located village extension sites being replaced by sites much further away from local facilities and which will, as a consequence, result in increased traffic congestion which could be otherwise avoided. This could be easily remedied by assessing the most sustainably located village extension sites as to how they perform against the main purposes of the Green Belt.

**Effective**

In relation to the delivery of Custom and Self-build housing, we do not consider the Plan will be effective due to over-reliance for provision through the four main strategic sites which are likely to be delivered towards the end of the Plan period. In order for the plan to be effective in relation to the Duty to meet the demand for Custom and Self-build housing, smaller bespoke sites should be identified and allocated.

**Consistent with national policy**

For the reasons set out above regarding the delivery and sustainability of Custom and Self-build housing, we do not consider the Plan to be consistent with national policy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

No.

We do not consider that the proposed Plan is sound as a whole in relation to the designation of new SANG Land and the implications this has for housing delivery both within the Borough and in meeting any unmet needs of neighbouring districts. In this respect, the Plan is not consistent with national policy; has not been positively prepared; is not justified and will not be effective in meeting objectively assessed needs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1904  Respondent: 12316001 / Vail Williams LLP (Jane Terry)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

No.

The actions taken by the Council to conform to the Duty to Co-operate are set out in the Topic Paper Duty to Cooperate, June 2016.

Cross Boundary SANG Provision

In relation to the specific issue of The Thames Basin Heaths SPA ad Provision of SANG, the Duty to Cooperate Topic Paper states at paragraph 4.41 that the Council has worked closely with Natural England to ensure the quantum and distribution of growth identified in the Proposed Submission Local Plan is deliverable by demonstrating there is sufficient SANG available across the Borough’ (my emphasis). Paragraph 4.42 continues that: ‘… we have cooperated with some of or neighbours to explore opportunities for cross boundary SANGs. We will continue cooperating on this matter as appropriate.’

Notwithstanding this, proposals for a cross boundary SANG have been submitted within the planning application for residential development in line with Policy A46 to the east of The Street, Tongham. This is a bespoke SANG which is intended to provide for the mitigation requirements of residential development to the south of Tongham (Policy A46). However it also provides additional mitigation capacity for further residential development within a 5km catchment area. The SANG is cross boundary SANG which straddles the Guildford / Waverley administrative boundary and is therefore well placed to mitigate the development needs of both authorities. The SANG proposal does not appear in the Guildford Infrastructure Delivery Plan as either a strategic SANG or bespoke SANG. Neither does it appear in the Waverley SPA Avoidance Strategy Review, April 2016. No reference is made to any specific cross boundary discussions on the provision of SANG so it is difficult to assess whether the Duty to Cooperate has been adequately addressed in this respect or not.

Provision of Housing within the SHMA
In relation to housing, reference is made to the Housing Delivery Topic Paper which discusses the approach to meeting needs. A Memorandum of Understanding on housing delivery has been signed between Guildford, Woking and Waverley which recognises that there is unmet need within the HMA and commits the three authorities to continued future joint working to ensure housing needs across the HMA are met in full. It states that the Council is committed to continuing to explore with Waverley and Woking those areas which are most likely to lead to positive outcomes. The Topic Paper goes on however, to state that Guildford does not consider it can sustainably accommodate any unmet need arising from Woking (or from Waverley should an unmet need be identified in the future).

The Localism Act establishes that the outcome of the Duty to Co-operate should lead to effective policies on strategic cross boundary matters: It is the outcome rather than the process that is critical to complying with this legal obligation. In relation to the requirement that local plans are prepared to meet objectively assessed needs, including unmet needs from neighbouring authorities, this statement is contrary to the Duty to Co-operate as it predicates how a positive outcome can be achieved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: SQLP16/1862</th>
<th>Respondent: 12316001 / Vail Williams LLP (Jane Terry)</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Question 5: Examination

If you are proposing a change to the Proposed Submission Local Plan: strategy and sites, do you wish to express an interest in participating at the Examination?

Yes

In order that the adequacy of Self-build and Custom provision can be fully considered in the light of up to date information on the councils register.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: SQLP16/1905</th>
<th>Respondent: 12316001 / Vail Williams LLP (Jane Terry)</th>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

Yes.

In order that the adequacy of SANG provision both within the Borough and cross boundary into Waverley can be fully considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/4322  **Respondent:** 13565569 / Persimmon Homes (Matt Richardson)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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The following comments should be read alongside the Odyssey Markides Technical Note dated July 2016, which accompanies these representations. We have drawn some of the comments within the Technical Note out, but expansions of these points are made within the note.

Two land allocation policies of note in the draft LP are Policy A29 and Policy A30. Policy A29 is a land allocation for up to 1,200 dwellings on land adjacent to that in control of PHTV, between Foreman Road and Harper's Road, as well as other small areas to the west. Policy A30 allocates land which is, in part, under the control of PHTV for provision of a new railway over bridge for vehicles and pedestrians. This new bridge will facilitate the closure of the existing level crossing on the A323 Guildford Road allowing unrestricted movement along the A323 and safer crossing for pedestrians; refer to Drawing NGBC-ASHSTATION.1/04 (Mayer Brown, November 2015).

Having reviewed the proposed railway over bridge it is apparent that it has been designed with some relaxation in Design Manual for Roads and Bridges (DMRB) standards applied, in order to allow the bridge to closely align to the existing route of the A323. A 30mph design speed has been used, with 90m forward visibility provided.

Based on this data it is considered that although implementing a new bridge over the railway line would be effective in reducing delay to the local highway network, it is not necessary in highway capacity terms as the operation of the level crossing would still be within capacity even after the LP developments are implemented.

The new bridge is set out in the Guildford Borough Transport Strategy 2016 as Local Road Network (LRN) Scheme LRN21 'New road bridge and footbridge scheme to enable level crossing closure on A323 Guildford Road adjacent to Ash railway station'. Its status is 'Anticipated' and its estimated cost is '£15m', with delivery between 2017 and 2026.

Those schemes categorised as anticipated are 'subject to a positive business case, funding can be secured, and planning and statutory approvals are likely to be achieved'.
The GBC Infrastructure Schedule, contained in Appendix C of the draft LP, states that the likely cost is £15m and the likely funding sources will be developer contributions, Local Growth Fund and from Network Rail. This document sets the delivery timescale as between 2018 and 2022.

It is reasonable for some material funding to come from developers of 'Land to the South and East of Ash and Tongham' for 1,200 residential dwellings, as set out in Policy A29.

It is however understood from the Enterprise M3 Local Enterprise Partnership (LEP) that there has been no submission made to the LEP for funding. The latest Expression of Interest (Eal) for the Enterprise M3 Local Growth Fund closed on 31 March 2016. This Eal allows for funding requests for schemes up to the year 2020/21. As the new railway bridge is stated as being delivered before 2026 it is therefore concluded that either (1) the bridge would be funded by developer contributions and Network Rail only or (2) that LEP funding will be requested in future and the delivery of the bridge would occur towards the end of the suggested delivery timescales (i.e. 2026).

It is not clear how much funding Network Rail would be providing for this new bridge. Network Rail would likely have to also fund a new pedestrian cycle footbridge with lifts in order to maintain, or improve, the current level of accessibility for local residents. Relying on pedestrians and cyclists using the new bridge would be contrary to this given the material greater distance to cross the railway line and the steepness of the proposed crossing. The cost of the footbridge with lifts could be £1.5M.

It is therefore unclear why GBC would classify this new bridge as 'anticipated' rather than 'aspirational'. Aspirational schemes are classified as 'a strong business case will need to be demonstrated in order to secure funding as the estimated cost presently exceeds typical funding envelopes and there are significant planning and statutory approvals to be achieved'.

No details are publically available with respect to the vertical alignment of the new bridge; however, it appears that the northbound forward visibility over the bridge would be materially compromised.

This is due to the gradient of the road between Foreman Road and the crest of the bridge, which would likely materially reduce the forward visibility in the vertical plane.

The forward visibility would also be impinged by the actual bridge structure. The bridge would need material safety structures and barriers along the edge of the parapets and embankments for both pedestrian and driver safety. As these would be a solid structure of over 600mm in height it would therefore compromise forward visibility, especially in the northbound direction.

Although it is understood that the location of the bridge was chosen to align as closely to the existing alignment of the A323 as possible, this alignment is not considered feasible.

It is also clear that no discussions have taken place between the parties over the delivery of the wider scheme and there is no common agreement over delivery, timings and funding etc and therefore piecemeal development will continue to come forward in the short term, further impacting upon the aspirational road scheme to come forward.

For those reasons listed above we therefore are of the view that the plan is unsound, because it is not justified, effective or indeed consistent with national policy.

**Question 2: Legal Compliance**

*Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant? Please provide the following information being as precise as possible:*

- **why you consider it is or is not legally compliant and**

- **what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.**

For those reasons set out above we do not believe that the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant. We have set out suggested changes under question 3 below.
Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

why you consider it is or is not sound and

what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

For those reasons set out previously we do not believe that the plan as proposed is sound. Whilst the concept within A30 of a road bridge, is a sound one, it is obvious that the evidence base supporting both its identification and indeed location are fundamentally flawed.

A more appropriate approach would see the complete delivery of land east of Foreman Road for residential development, with land being safeguarded for the delivery of a pedestrian crossing. The road bridge could then be delivered more appropriately within the major development area. This would allow units to be delivered early within the plan period, which as has been shown previously is much needed and more importantly, will allow the delivery of a new bridge, which has been designed properly, is deliverable, appropriate and capable of serving not only existing residents, but also future ones.

It is not considered that the new rail bridge is required at this time, as the vehicle queues at the existing level crossing clear between the time that the barriers are down and as already determined by sec the crossing would still operate within capacity even in 2031 with the addition of the LP sites.

It is however considered reasonable that there is a long-term desire to close the level crossing and provide a bridge over the railway line. It is indeed Network Rail policy to close level crossings wherever possible, in order to improve pedestrian safety and reduce rail related accidents.

If it is accepted that the level crossing should be closed and an overbridge provided in the long-term, it is considered that there is a more suitable location for the new bridge. It is considered that the bridge should be located further southeast. This would then sit across the land between the A323 and the Policy A29 land boundary and within the latter itself.

This has a number of benefits, most notably there would be more land for the road alignment to be designed to allow for sufficient forward visibility, both in the vertical and horizontal planes.

There is also the potential for a new comprehensive link road to be established between the A323 Guildford Road, through the 'Land to South and East of Ash and Tongham' site, to South Lane. This link road would then continue through the 'Land South of Ash Lodge Drive' site, as per their planning permission, to Manor Road.

The northern end of the link road could realign Guildford Road into the 'Land to South and East of Ash and Tongham' site, which could then provide the new bridge within land under this site's control. This could also have the benefit of enabling the parcel of land to the north of the railway line (and west of the new road) to realise a car park or drop-off area for Ash Railway Station.

The new bridge over the railway line could also be designed to have less environmental impact, than the current proposed alignment, as it could be fully designed into the proposed 1,200 residential unit development. The spine road, south of the railway line, would connect south to South Lane and also connect to Foreman Road thus giving alternative routeing options for both development and through traffic.

The principle of a new railway bridge to come forward in the long-term alongside the closing of the level crossing is accepted; however, it has been demonstrated that this is not required in the short-term.

Furthermore, it is considered that in order to realise a suitable design, and thus implementation, a revised alignment would be needed. A more suitable and achievable location for the bridge, and the alignment of the A323 either side of the bridge, would be for it to align through the Policy A29 site. This could enable the bridge to be designed in accordance with DMRB standards with suitable forward visibility achieved.
Question 4: Duty to cooperate

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

why you consider it has or has not complied with the Duty to cooperate and what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case.

Please see our comments and responses under question 1. Whilst the council should be applauded for making difficult decisions with regards to the increase in the housing numbers to be planned for and indeed decisions associated with Green Belt releases it is clear that the Duty to Cooperate has not been met with regards to seeking to meet the needs from London for example.

Question 5: Examination

If you are proposing a change to the Proposed Submission Local Plan: strategy and sites, do you wish to express an interest in participating at the Examination?

If you choose yes, please explain why you wish to participate in the Examination.

We would like the opportunity to attend the Examination in Public as we believe that the comments, recommendations and observations we have made need to be discussed in a public arena and so that we can outline the reasons for the emerging plan failing the soundness tests as drafted.

Question 6: The content of the plan

Question 6 of the paper version of this questionnaire asks you to make comments about particular paragraphs, policies or site a/locations in the Proposed Submission Local Plan: strategy and sites.

Please see our earlier comments as they specifically relate to S2, A29 and A30.

I trust that everything is in order and that the above comments are helpful.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 20160718114724534.pdf (928 KB)
20160718152652831.pdf (1.4 MB)
20160718152735975.pdf (1.1 MB)
20160718152825671.pdf (1.5 MB)

Comment ID: PSLPA16/4323  Respondent: 13565569 / Persimmon Homes (Matt Richardson)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **Objectively Assessed Need**

Guildford Borough has an identified (OAN) of 693 dwellings per annum following the conclusions of the West Surrey Strategic Housing Market Assessment (SHMA) produced in September 2015 by GL Hearn. This assessment was carried out as part of the Housing Market Area (HMA) known as West Surrey which included Waverley and Woking in addition to Guildford. Persimmon have concerns that the SHMA may have under-estimated the OAN for Guildford due to migration from London into the borough expected to increase and by downplaying the need for jobs. The most recent population projections produced by Office of National Statistics (ONS) shows that by 2037, the population of Surrey is expected to increase by over 200,000 and this increase is anticipated to be faster than previously considered based on 2012 population figures, which have informed the SHMA which in turn has informed the housing requirement for the new Local Plan. It can be expected that a large proportion of this increase will be in the West Surrey HMA due to its proximity to London, strong rail connections and reputation as being part of the commuter belt and a desirable place to live. It is on this basis that Persimmon believe that the OAN to be inaccurate and should be revised upwards taking into account the increases based on the 2014 projections as opposed to the 2012 figures. This should, in turn, mean that the housing requirements in the new Local Plan should also be revised upwards, taking into account the updated projections; the constant under delivery in recent years and the need to better allow for flexibility within the plan for economic growth reasons etc.

This point is further supported by the established planning principle of seeking to plan for balanced growth in jobs and homes where possible with a view to reducing the need to travel and commuting distances. The SHMA identifies that to support the forecast growth in employment a high level of growth is needed.

1. **Five-year supply of deliverable housing land**

Paragraph 47 of the NPPF states that there is a requirement for Local Planning Authorities (LPA) to "identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5%...where there has been a record of persistent under-delivery of housing, LPAs should increase the buffer to 20%". It has been established that GBC cannot demonstrate a robust five year supply of deliverable housing land and at best the Council can show 2.5 years supply whilst at worst this drops to 1.4 years. It is also clear that Guildford has persistently and consistently under delivered and therefore those sites, which are capable of coming forward sooner should do, without being fettered by ill conceived policy requirements.

1. **Housing requirements within new Local Plan (2013-2033)**

The pre-submission version of the draft Local Plan makes provision for the delivery of 13,860 new homes over the plan period (2013-2033). This equates to 693 dwellings per annum which matches the identified housing need through the SHMA. The draft Local Plan states that "the delivery of new homes is expected to increase over the plan period, reflective of timescales associated with delivery of strategic sites". The draft Local Plan sets out the housing delivery in different tranches as below:

The above shows that there is proposed to be an increasing level of delivery over time as the plan progresses through the plan period. On this basis, to ensure the minimum housing requirements are achieved, over the first five years of the plan an average of 693 dwellings per annum are to be delivered. This raises an immediate concern given that GBC cannot demonstrate a five year land supply of any better than 2.5 years. As the net completions table also shows, the first two years of the plan period 2013/14 and 2014/15 have delivered significantly fewer than 693 dwellings per annum. We are concerned that insufficient sites have been identified to deliver this housing provision and concerns particularly over the deliverability of Wisley Airfield. Should the airfield be unable to deliver the allocated 2068 dwellings as proposed, then this number will have to be subsumed in other areas and given the local opposition to this scheme and impact on the highway network the deliverability of Wisley Airfield must be strongly questioned.

It is therefore clear that the evidence used for the Proposed Submission Local Plan Strategy from a housing perspective is not adequate or up to date.

Does the SHMA use the latest housing projections?

In addition, for those reasons above, whilst we recognise that the council has made some difficult decisions concerning some of the large strategic allocations, these are by their very definition slow to deliver units and it is clear that the council are not planning to deliver any meaningful increase in supply in the short term and for these reasons, those sites which are
capable of delivering units quickly within the first five years of the plan should be considered favorably; this includes land to the east of Foreman Road, Ash.

With regards to more specific comments, Persimmon Homes are pleased that both policies A29 and A30 identify the site for development, however, we do not believe for those reasons below, that the identification of a road through part of the site is appropriate; feasible or indeed the correct approach. For the reasons set out below it is therefore clear that the evidence used for the Proposed Submission Local Plan Strategy and Sites is not adequate, up-to-date or indeed relevant.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 20160718114724534.pdf (928 KB)
20160718152652831.pdf (1.4 MB)
20160718152735975.pdf (1.1 MB)
20160718152825671.pdf (1.5 MB)

Comment ID: PSLPA16/4324  Respondent: 13565569 / Persimmon Homes (Matt Richardson)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ash and Tongham

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This letter constitutes Persimmon Homes Thames Valley's formal response to the above consultation. As part of the Persimmon Group, Persimmon Homes represents one of the largest house builders in the UK and is a significant stakeholder in the Borough with a vested interest in its long-term future.

We have · made a number of comments, but reserve the right to make further comments as appropriate. We are keen to work with the council moving forward.

The comments within this letter relate to our interests at Foreman Road, Ash, which lies on the edge of Ash. The Site has the potential to accommodate circa 120 dwellings.

We have set out some general comments below and have then looked to answer the specific questions raised by the council.

Overview of the site

The site allows for an extension to the existing Ash settlement boundary and provides an excellent opportunity to accommodate new homes. Development of the site, in coordination with the provision of a potential pedestrian crossing to the railway line to serve the area would provide betterment to the local area. The site comprises one large field of approximately 4 hectares and is a grass field bordered by mature vegetation, including scrub, tree belts and mature individual trees. The Site is identified within two specific policies of the plan, namely A29 and A30. Specific comments on both policies will be set out within these representations.

Persimmon Homes have an option agreement with the landowners. The site is available, suitable and deliverable for residential development in the short term (0-5 years).

Question 1: The evidence base and submission documents

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?
Guildford BC planning context & housing numbers

Guildford BC is currently in the process of producing a new Local Plan which is to cover the period 2013 - 2033 and guide development within the borough and is to be compliant with the National Planning Policy Framework (NPPF). This representation is in response to the Regulation 19 consultation phase for the pre-submission version of the draft Local Plan. Persimmon Homes are pleased to have been given the opportunity to make representations on this concerning the Site and general planning matters within the Borough. Persimmon are also pleased that Guildford BC has acknowledged the significant challenges that the borough faces in delivering sufficient housing to meet its needs. The previous interim housing figure of 322 dwellings per annum agreed on May 2012 did not take account of up to date assessments of housing need and therefore was not NPPF compliant. The reliance on this figure has meant that Guildford BC has significant under-delivered on their housing requirements over the past five years as shown in the below table:

As the housing completions above show, Guildford has not only been under delivering against the now up-to-date Objectively Assessed Need (OAN) but there has also been consistent under-delivery against the interim housing target, which also needs to be factored into an emerging housing target moving forward.

The most recently produced Annual Monitoring Report (AMR), published in October 2015 for the period 2014/2015 showed that net completions of dwellings in the borough for this period was 242 and that the majority of homes completed in this period are on sites of under 20 homes. As the AMR notes "the number of new homes completed this year (2014/15) is still lower than required to meet our objectively assessed need...contributes to a growing deficit of new homes". The recommendation within the AMR following this states that "housing provision is currently restricted by the lack of available and deliverable development land in the borough....delivery rate is only likely to increase when larger areas of land are suitable and available for development". This shows the necessity for suitable and available sites to be considered and this should apply to all sites within the borough that meet this criteria. Persimmon Homes have control of the Site through an option agreement with the landowners and the Site is available for development. The council also consider the site to be suitable for development, having identified it within the proposed submission Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [20160718114724534.pdf](20160718114724534.pdf) (928 KB)
[20160718152652831.pdf](20160718152652831.pdf) (1.4 MB)
[20160718152735975.pdf](20160718152735975.pdf) (1.1 MB)
[20160718152825671.pdf](20160718152825671.pdf) (1.5 MB)

Comment ID: PSLPA16/4282  Respondent: 13579713 / Roger Daniels  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Five-Year Housing Land Supply

Based on the housing supply trajectory, and after allowing for a backlog of under-supply projected for 2013/14 to 2016/17, the five-year housing land supply in 2017 (assumed to be the year of adoption for the Local Plan) would be equivalent to only 3.1 years’ requirements (a five-year deficit of 2,024) based on an annual requirement of 693 dpa.
The five-year housing land supply in 2017 would be equivalent to only 3.5 years’ requirements (a five-year deficit of 1,476) based on the five-year requirement in the trajectory which reduces the basic requirement for 2017 to 2022 by 522 dwellings (from 3,465 to 2,943) for reasons that are not explained. The relevant calculations are shown in Table 4 on the right.

There are several different assumptions that can be used to calculate a five-year housing land supply. In this case, we have incorporated the past deficit/backlog in the requirement for the following five years (the Sedgefield Method) and have applied a 5% buffer ‘to ensure choice and competition in the market for land’, following NPPF paragraph 47.

We have included the Council’s calculation of housing requirements for 2017-2022 as they appear in the trajectory, but can see no justification to depart from the overall target of 693 dpa. There may be a case for applying a 20% buffer for ‘a record of persistent under delivery of housing’ which would imply an even bigger gap between housing requirements and five-year supply. Further refinements will be possible for the examination of the plan when additional data is also likely to be available.

These problems of housing land supply are not overcome by the Council’s approach to phasing in Local Plan Policy S2, by which the planned delivery of housing is deferred until later in the plan period. As noted above, this approach is not justified in terms of housing requirements, but is solely a response to problems of housing delivery that result from the spatial development strategy. Local Plan Policy S2 is evidently not sound.

For a Local Plan to be found sound, it is essential for the local planning authority to be able to demonstrate that there is a five-year supply of specific, deliverable sites for housing, with an additional 5% buffer, ‘to ensure choice and competition in the market for land’ as well as ‘a supply of specific, developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15’ (NPPF, paragraph 47).

In this case, the Land Availability Assessment demonstrates that there is not a five-year supply of housing land. It also shows that the projected supply of housing land will fall short of requirements for the next twelve years. There is therefore no possibility that the Local Plan should be found sound in these circumstances. A different spatial development strategy is required to identify sites for housing development that can be delivered in the early years of the plan period. Suitable, sustainable options will include sites that are closely related to the main urban areas and larger villages, and will entail a more detailed and realistic approach to reviewing the boundaries of the Green Belt.

Conclusions

The need for additional housing land in the early years of the new Local Plan requires looking at a variety of sources and locations, including a more realistic approach to Green Belt Review. Housing need represents one of the exceptional circumstances that can justify alterations to Green Belt boundaries, as described in paragraph 83 of the NPPF. Paragraph 85 of the NPPF sets out the proper approach to defining Green Belt boundaries in local plans, which includes consistency with the Local Plan strategy for meeting identified requirements for sustainable development.’

The Green Belt & Countryside Study states that it was not seen as pre-empting the Spatial Development Strategy, but in practice Green Belt was a major determinant of the Spatial Development Strategy and, as the Green Belt Review was completed before a full, objective assessment of housing requirements in the SHMA, Green Belt and the Spatial Development Strategy have both become constraints on meeting housing requirements, especially in the early years of the plan.

The Spatial Development Strategy (Policy S2) and Green Belt Policy (Policy P2) are not based on sufficiently positive approaches to reviewing the Green Belt and settlement boundaries and do not give sufficient weight to meeting objectively assessed housing requirements throughout the plan period. They do not comply with the NPPF and cannot therefore be considered to be sound. Modifications to the Plan should include sites such as those identified in Wood Street Village as residential allocations within an extended settlement boundary and Green Belt inset, as described above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: BRS.5587_PLANNING_SUBMISSION_FINAL.pdf (4.4 MB)
The Green Belt Boundary

The inset boundary for Wood Street Village has been drawn very tightly (Map 3 - see end of document) to include only the east of the settlement: along Oak Hill east of Pound Lane and west of Pinks Hill; excluding Wood Street Green, the surrounding areas along White Hart Lane and the whole of Frog Grove Lane to the east and north. It is anomalous that the village conservation area, which helps to define the essential character of Wood Street Village, is outside the proposed settlement inset boundary.

The proposed inset boundary would allow for the development of some small sites in Wood Street Village including: land at 148 Broad Street, a site of 0.32 ha previously used for vehicle sales, maintenance and storage, which the Land Availability Assessment (LAA) of February 2016 identified as suitable for 12 dwellings (Site 115); a previously-developed site of 4.4ha with mixed uses at Oak Hill which the LAA identified as suitable for 22 dwellings (Site 35); and land to at ‘Roundoak, White Hart Lane which the LAA identified as suitable for traveller accommodation (Site 2114). These sites enter into the LAA housing figures, although only sites for 23 or more dwellings are shown on the Proposal Map.

The approach to Green Belt insets needs to comply with paragraph 86 of the NPPF which states:

‘If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.’

Paragraph 85 of the NPPF sets out the proper approach to defining Green Belt boundaries in local plans, which includes ‘consistency with the Local Plan strategy for meeting identified requirements for sustainable development.’ The Council’s Land Availability Assessment (February 2016) demonstrates that the Spatial Development Strategy of Policy S2, is unable to meet the objectively assessed need for housing throughout the plan period, largely because of constraints imposed by Green Belt Policy P2 and related proposals maps. Impacts on housing land supply are considered in more detail below.

The settlement boundary for Wood Street Green appears to have been drawn tightly to restrict development, rather than to allow for housing and other forms of development to take place within the settlement, to meet the changing social and economic needs of the village and the borough.

Not all the open parts of Wood Street Village are important for their contribution to the Green Belt. There are infill sites, such as those previously identified, where development could make a useful contribution to meeting housing needs, consistent with the size and character of Wood Street villages and its local facilities, and without compromising the essential roles of the Metropolitan Green Belt.

The Site of Nature Conservation Interest provides a natural boundary to the south of the village. To the north west of the village, it is reasonable to exclude Frog Grove Lane from the inset areas as it is essentially ribbon de-velopment extending for over a mile from Oak Hill/Wood Street Green northwards to join the Aldershot Road (A323). A flood risk area and an area of registered common land are also constraints on development on Frog Grove Lane. However, the Green is clearly part of the core of the village and there are areas surrounding the Green that should also be included within the settlement boundary and Green Belt inset and should be allocated for appropriate development.

The inset boundary should therefore be extended westwards to include Wood Street Green, surrounding development and the sites previously identified as ‘Potential Development Areas’ (Map 2 - see end of document); to allow for appropriate development.
development within the functional boundary of the settlement in accordance with accessibility to local facilities, existing residential development and natural boundaries that can be defined on the ground, including roads and vegetation that would provide long-term, defensible, natural boundaries for the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: BRS.5587 PLANNING SUBMISSION_FINAL.pdf (4.4 MB)

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Local Plan Policies S2 and P2, in particular, are not sound.

Policy P2 and the related maps of Green Belt boundaries are also not sound as they are based on a review of Green Belt boundaries that does not comply with paragraphs 84 and 85 of the National Planning Policy Framework. In particular, insufficient weight has been given to the need to promote sustainable patterns of development and to the consistency of the policy with meeting identified requirements for sustainable development.

Opportunities for sustainable development for housing and other uses associated within the edges of the main urban areas and other settlements have been overlooked because of an inappropriate approach to review of the Green Belt, based on the boundaries of largely irrelevant land parcels.

The review of Green Belt at Wood Street Village exemplifies these shortcomings, which are explained in detail in the report that forms part of this submission. There are opportunities for sustainable development in the village on sites that were identified as Potential Development Areas in the Green Belt & Countryside Study.

The proposed inset boundary for Wood Street Village is unduly restrictive. It excludes large parts of the settlement, including its Green, Conservation Area and Potential Development Areas which are proposed to remain in the Green Belt. The inset boundary appears to have been drawn to restrict development to previously developed sites.

The inset boundary for Wood Street Village should be redrawn to take account of the need to promote sustainable patterns of development and to recognise opportunities for meeting the identified requirements for sustainable development in the village, within revised Green Belt boundaries that also reflect physical features that are readily recognisable and likely to be permanent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Page 1830 of 2855
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Background**

Lightwood Strategic submitted representations on the Local Plan Issues and Options consultation in November 2013 and on the Local Plan Consultation Draft (Regulation 18) in September 2014. Their representations expressed concerns about the Council’s proposed approaches to:

- the objective assessment of housing needs;
- Green Belt review; and
- Settlement boundaries in the larger villages, particularly at Wood Street Village.

Lightwood Strategic pointed out that there are natural infill sites in Wood Street Village (including the two ‘alternative sites’ shown on Map 1 - see end of document) that can provide SANG and are located only a short distance from the village green, shops and other amenities.

The Council identified these two sites in April 2014 as ‘Potential Development Areas’ in its Green Belt & Countryside Study (Map 2 - see end of document). It also undertook analysis of various characteristics of the settlement in its Green Belt & Countryside Study to determine whether it was appropriate to define an inset boundary rather than leave the whole village as ‘washed over’ by the Green Belt.

The Council has modified its approach to villages in the Green Belt, in response to the National Planning Policy Framework (March 2012). In the 2003 Local Plan villages were generally ‘washed-over’ by the Green Belt. New Local Plan Policy P2 provides for Wood Street Village and 13 other villages (as well as several, large previously developed sites) to be inset from the Green Belt. In these villages, Policy D4 (Development in Urban Areas and Inset Villages) allows for limited development within strict environmental guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [BRS.5587 PLANNING SUBMISSION FINAL.pdf (4.4 MB)](BRS.5587 PLANNING SUBMISSION FINAL.pdf)

**Comment ID:** PSLPP16/18585  **Respondent:** 13579713 / Roger Daniels  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy P2 and the related maps of Green Belt boundaries are also not sound as they are based on a review of Green Belt boundaries that does not comply with paragraphs 84 and 85 of the National Planning Policy Framework. In particular, insufficient weight has been given to the need to promote sustainable patterns of development and to the consistency of the policy with meeting identified requirements for sustainable development.

Opportunities for sustainable development for housing and other uses associated within the edges of the main urban areas and other settlements have been overlooked because of an inappropriate approach to review of the Green Belt, based on the boundaries of largely irrelevant land parcels.

The review of Green Belt at Wood Street Village exemplifies these shortcomings, which are explained in detail in the report that forms part of this submission. There are opportunities for sustainable development in the village on sites that were identified as Potential Development Areas in the Green Belt & Countryside Study.

The proposed inset boundary for Wood Street Village is unduly restrictive. It excludes large parts of the settlement, including its Green, Conservation Area and Potential Development Areas which are proposed to remain in the Green Belt. The inset boundary appears to have been drawn to restrict development to previously developed sites.

The inset boundary for Wood Street Village should be redrawn to take account of the need to promote sustainable patterns of development and to recognise opportunities for meeting the identified requirements for sustainable development in the village, within revised Green Belt boundaries that also reflect physical features that are readily recognisable and likely to be permanent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/17501 | Respondent: 13579713 / Roger Daniels | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Local Plan Policies S2 and P2, in particular, are not sound.

The proposed phasing of housing supply in Policy S2 (Borough Wide Strategy) is not justified and does not seek to meet the objectively assessed need for housing consistently throughout the plan period. It is clear that there would not be a five-year supply of housing on adoption of the plan and there are other doubts about whether housing targets will be met because of restrictions on the release of housing land imposed by Green Belt Policy (P2) and the Spatial Development Strategy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<p>| Comment ID: PSLPP16/17514 | Respondent: 13579713 / Roger Daniels | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |</p>
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### Housing Needs And The Spatial Development Strategy

Policy S2 of the Local Plan and the Land Availability Assessment of February 2016 (LAA) show that the overall projected supply of housing land (15,116) exceeds the forecast requirement (13,860) over the whole plan period, but that the Council has phased the housing requirement in a curiously uneven way, to reflect constraints on delivery of the required housing supply in the early years of the plan, rather than housing needs.

Even with this unwarranted adjustment to the phasing of housing requirements, the housing supply trajectory (below) shows forecast land supply (the blue line) to be below the forecast requirement (the red line) from 2013/14 to 2018/19 and that the cumulative deficit (the green line) will not be made up until 2027/28; 15 years into the 20-year plan period:

The housing supply trajectory in the LAA also shows that there will not be a five-year housing land supply when the Local Plan is adopted unless there are changes in policy to improve the delivery of housing sites in the early years of the plan. Five-year housing land supply is described in more detail in Section 4.

Changes in the Spatial Development Strategy of Local Plan Policy S2 will be required to increase housing land supply in the early years of the plan to achieve the aims in paragraph 14 of the NPPF:

‘...local planning authorities should positively seek opportunities to meet the development needs of their area’

‘Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change...’

and the aim in paragraph 47 of the NPPF:

‘to boost significantly the supply of housing...’

Required changes in the Spatial Development Strategy of Local Plan Policy S2 include the allocation of more small and medium-sized sites in sustainable locations that are associated with the main urban areas and larger villages, where development can progress in the early years of the Local Plan, utilising existing infrastructure such as local schools and other services. Changes in the Spatial Development Strategy will need to be associated with a more detailed and realistic approach to the review of Green Belt boundaries.

### What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [BRS.5587_PLANNING SUBMISSION_FINAL.pdf](#) (4.4 MB)
The proposed phasing of housing supply in Policy S2 (Borough Wide Strategy) is not justified and does not seek to meet the objectively assessed need for housing consistently throughout the plan period. It is clear that there would not be a five-year supply of housing on adoption of the plan and there are other doubts about whether housing targets will be met because of restrictions on the release of housing land imposed by Green Belt Policy (P2) and the Spatial Development Strategy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1974  Respondent: 13579713 / Roger Daniels  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

No.

The accompanying report points to shortcomings in the Green Belt & Countryside Study as a basis for reviewing Green Belt boundaries and identifying appropriate allocations to meet the objectively assessed need for housing throughout the plan period.

The Land Availability Assessment is not based on a consistent rate of housing delivery that reflects housing requirements and shows a shortfall in housing land supply in the early years of the plan, including the absence of a five-year supply of housing land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1975  Respondent: 13579713 / Roger Daniels  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)
Yes.
Sustainable Land PLC does not challenge the legal compliance of the Proposed Submission Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

No.
The Local Plan is not sound because of its failure to meet the full objectively-assessed need for housing over the whole of the plan period and its failure to achieve a five-year supply of housing land on adoption of the Local Plan. The Review of Green Belt and Spatial Development Strategy have not been based on giving sufficient weight to meeting the full objectively-assessed need for housing throughout the life of the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

No.
The Local Plan has not demonstrated compliance with the Duty to Co-operate. The SHMA Briefing Note says that the strategy’s link with housing needs in adjacent local authorities ‘will be explored as part of ongoing work’. There should be evidence that the duty has been discharged, including consideration of unmet housing requirements in neighbouring local authority areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: SQLP16/1978  Respondent: 13579713 / Roger Daniels  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

Yes.

Lightwood Strategic wishes to participate in the Examination to amplify its responses to this consultation; to provide further evidence on matters, issues and questions that will be identified by the Inspector; and to contribute to discussions with the Inspector and other participants on the basis of its knowledge and experience of the issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1980  Respondent: 13579713 / Roger Daniels  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

No.

Lightwood Strategic has no further comments at this time.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1663  Respondent: 13594401 / Sarah Haddy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Key facts
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Firstly I would like to quote Councillor Paul Spooner 'I want to keep Guildford as a very special place for all who live and work here'

I feel that this aim has been lost.

2.10a Infrastructure

2.13 – The pedestrian crossings in Burpham add to the very frequent traffic jams as the timings are badly set.

2.14b – You say there is congestion but your plans do not offer a solution, in fact will make it worse.

2.22 – I am concerned that this has been removed because it is vital not to ignore the pressure on existing infrastructure. Every day, including weekends there is congestion in Burpham, not helped by the new supermarket you recently allowed to be built. The plans for Gosden Hill Farm will not improve this difficult situation, in fact they will make it worse. It will have a detrimental effect on the quality of life in the area. Already there are many times, at least twice a day, when it is extremely difficult to drive in or out of the area and, because of the standing traffic the air quality is poor.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1665  Respondent: 13594401 / Sarah Haddy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Car free new developments are completely unrealistic in this age. It would impact negatively on the neighbouring estates. New housing estates and new retail outlets must be built with sufficient parking.

The changes made to the plan do not seem to address any of the concerns for our local environment and our quality of life. Many of the changes do not clarify but leave much open ended and open to interpretation and indeed leave back doors open for worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/5698  Respondent: 13596353 / MARK WORSFOLD  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I strongly object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. Delisting of land in this way makes a mockery of the Green Belt and any environmental and planning legislation or regulation.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI). Specifically there are a large number of Red Listed species that either use this site or are the adjacent farmland. All will be affected by this development proposal. For example, there are significant numbers of Northern Lapwing that are either resident (nesting) or migrating through this site each year.

• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

• And I most strongly object to the continual destruction of this ‘green and pleasant land’ for short term pecuniary gain. We live on an increasingly overcrowded island and are reliant on imports for most of our foodstuffs. In the long term this is unsustainable and the proposed Local Plan will only exacerbate this dire situation. Building over good, crop-growing farmland is not only absurd but ill-advised given this pertinent fact.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I reside in Orchard Way in Send, Woking and I wish to formally lodge a strong objection to the proposal to build new housing developments on ‘green belt’ land in the Send and Ripley area.

I wish to go on record and formally object to the late amendment to the Garlick’s Arch proposed development that was added to the local plan without sufficient notice for considered consultation, evaluation, and a review of the evidence that a development is necessary.

I wish to formally object to the lack of supporting evidence that demonstrates demand for that such a disproportionately large housing estate on a green belt site adjacent to local country villages.

I wish to formally object to the planned A3 junction adjacent to Garlick's Arch and the proposed changes to changes to the Burnt Common are as this will have a severely negative impact on the local rural area and the surrounding villages that will not be able to manage the significant increase in motor vehicle traffic in already congested single lane rural roads. The proposal will encourage vehicles to join or exit the A3 that will lead to significantly more through traffic passing schools (Send First and Clandon primary) increasing the risk of injury or worse to local school children.

I wish to formally object to additional housing developments when local schools are already at capacity and over subscribed with new applicants. The school in Send where my daughter attends is currently being rebuilt, with no further capacity to take additional children and has not announced plans to expand further to accommodate additional places. There is also insufficient secondary school places in the borough and surrounding boroughs with children already struggling to gain a place at their first choice school.

I wish to formally object to all the additional houses as the local doctors' surgery is already at capacity and this will put additional pressure on the services impacting on its ability to provide an effective and efficient service to the community.

I wish to formally object to the additional vehicular traffic that will use an already congested local network of country roads that pass through the villages in and the surrounding areas, causing further risk to our children as they travel to and from their village school.

I also wish to formally object to the proposed housing development and traveller pitches off of Send Hill. This is completely unnecessary with sufficient pitches already in existence across Surrey and the South East. The geographical layout of Send Hill is insufficient to cope with the potential increased traffic flow as the road is insufficiently wide enough to accommodate such demands. The woodland surrounding the area proposed is also home to bats and local wildlife that would be placed in danger if this unnecessary proposed development was permitted to go ahead.

There are sufficient brown field sites that are prime for redevelopment without the need lose these green belt areas forever. We chose to live in Send and raise out children in the borough of Guildford due to the principles of preserving green belt area in Surrey. To permit these proposals would wholly inappropriate and cause irreparable damage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/54  **Respondent:** 13707041 / Kirsty Lockie  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The other issue that I wanted to comment on was the issues with traffic in Guildford town. This is a key and major aspect of success for this local plan - there needs to be a realistic and effective plan to manage traffic around the town and from the proposals I've seen so far, they do not go nearly far enough and in some cases look like they might make the situation even worse.

I hope these comments are helpful.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/149</th>
<th>Respondent: 13707041 / Kirsty Lockie</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Whilst I spent 11 years trying to get onto the housing ladder in Guildford myself and can completely understand the frustrations of many that they are unable to buy somewhere, we do not have enough land in this county to keep building new houses on without destroying it completely so consideration needs to be given as to where to draw the line and leave housing as it is. Guildford has already become too large ruining much of it's character and overwhelming it's infrastructure. Please stop trying to grow it even more. One way to stop it's out of control growth is to stop building more homes.

I do believe the area could take some additional homes but not nearly as many as are being proposed. I would suggest less than half and even then the drainage will need to be revamped and the traffic situation will need to be reviewed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<th>Respondent: 13707041 / Kirsty Lockie</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I'm afraid I do not have time to trawl through the multitude of documents that have been produced but I wanted to comment on the planned development in Flexford/Normandy. Whilst I appreciate the need for more housing in Surrey, the scale of this development will not work. The infrastructure (in particular roads and drainage) will not be able to handle that many more homes. The idea that a new school is needed in the area is questionable at best and feels like a way of justifying the scale of the development.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/148  Respondent: 13707041 / Kirsty Lockie  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

In addition to these other concerns, a development of this scale on greenbelt land would be a disaster for Surrey's Natural Beauty taking away some key green belt land that is a key part of the county's charm and appeal. I am concerned with GBC's attitude to Greenbelt land in general within this local plan as many of the housing development areas are in greenbelt land rather than using the many, many brownfield sites available within the county.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2628  Respondent: 13713825 / Barry Williams  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

However, I feel that more needs to be done to mitigate the possible effect of increased traffic levels on the A 281 should the Dunsfold Aerodrome housing development go ahead in our neighbouring borough and offer some suggestions - in part based on an old GBC document

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2630  Respondent: 13713825 / Barry Williams  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Guildford Urban Area
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

River Wey Pedestrian Bridge by the rowing club

- If this had ramps on both sides then cyclists could use it as an extension of NCN22.
- This ramp / cycleway extension might allow a separate cycle route into Millmead and then continue under the gyratory along the western side of the river past The Billings

Wheelchair users, mums with pushchairs could also use it and avoid the A 281

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2629  Respondent: 13713825 / Barry Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (north)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site 81 Shalford Railway Station

- There is a large area currently used as a commercial self storage facility in both an old railway shed / warehouse and many stacked up rows of shipping containers
- Does this have potential for a park and train facility with maybe a shuttle train to Guildford central and the new proposed east and west stations

Site 168 Land to north of Stonebridge Depot

- The red square identifies a former landfill site - does this have potential for a Park and Ride on the A 281 helping to mitigate any Dunsfold effect?
- Just below the red square is a Police & Ambulance vehicle maintenance site and opposite that is SCC Wey House School - do these have potential for other uses

A 281 Footpath / cycle path

- Shalford suffers in my view by not having a contiguous and paved footpath along the western side of the A 281 between the Tillingbourne Bridge and the war memorial by the church green - meaning that pedestrians have to short cut through the grave yard or cross over the A281 by the Tillingbourne Bridge - difficult and dangerous at any time due to traffic volume. If some of the St Mary Church land could be taken it would allow an upgraded pathway along the western side.
• GBC may argue that pedestrians and cyclists could use an alternative route along Dagley Lane, via the Thames Water Treatment site and the Shalford Park cycle way. In fact many women will not use that pathway as they feel unsafe walking through that wooded area.

Dagley Lane is in turn part of National Cycle network NCN 22 - and in winter time from the area south of Thames Water it is impassible for cyclists due to being unpaved and extremely muddy. An extension of this route to more effectively cross the Shalford Commons and join to the Downs Link would also be of value.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10918  Respondent: 13713825 / Barry Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Guildford desperately needs affordable housing - whether it be located on brownfield or green belt sites

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10919  Respondent: 13713825 / Barry Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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We need road and public transport improvements, a proper bus and train interchange and key infrastructure works carried out along sections of the A3 to help remove traffic from the town centre.

For these reasons, I support the aspirations of the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I would like to make it clear that I am incredibly disappointed in the way that GBC has put this plan forward to residents. The almost complete lack of information is appalling. It is completely inappropriate to only have 3 unpublished drop in sessions. For documents to only be available at council offices during office hours or for local libraries to not even know where the documents are. We had to ask 3 members of staff in Guildford library to see the documents and instead of these being presented in an open and organised manner they were stuffed in a box and hidden at the bottom of a shelf.

I am also thoroughly unimpressed with the manner in which you are asking people to give their opinions. It is again totally inappropriate to expect people who have had to wade through multiple documents to find out what the proposals are to then have to do the same to give their opinion.

In general I support the plans and think that those involved are trying to benefit the borough but the way this consultation has been carried out makes it look like they are ashamed of what they are proposing and want to make it as difficult as possible for people to give their views.

My main concerns with the proposals are the number of car parks that are being proposed as sights for housing and the impact this will have on trade. The lack of any definition as to the community facilities which will accompany new housing projects - these are vital to both new residents and the existing residents who will have to cope with the increase in housing. I am also not happy with the lack of road plans which have been put in place - these need to come first and therefore should be in the forefront and being planned now.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The proposed number of new houses in the Borough is unrealistically high, and will have a seriously detrimental effect on the Green Belt surrounding Guildford. If such land is built on, it will be lost forever. In particular, the Gosden Hill Farm site should not be removed from the Green Belt. All development should be restricted to brownfield sites.

Because of Guildford’s situation as a gap town, there isn’t room for a significant increase in retail and office development. There are already a sufficient number of shops and offices. All that is needed is a swift redevelopment of the site between North Street, the Friary and Woodbridge Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

It is not considered that Policy E3 as worded is sound on the basis it is not compliant with NPPF paragraph 22.

NPPF paragraph 22 states that planning policies should avoid the long term protections of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. The proposed current wording does not provide enough flexibility to avoid the forced protection of sites which are no longer considered suitable for employment use.

The third bullet of the policy (which relates to resisting the loss of all employment uses outside of Strategic Employment Sites and Locally Significant Employment Sites, as defined in Policy E1) and requiring evidence of marketing will also cover sites within Guildford Town Centre. This blanket approach is unreasonable and unrealistic, and would serve to prevent prompt redevelopment in response to fast-moving markets demands for ‘Town Centre’ uses that are encouraged and supported by the NPPF. Town Centre uses normally generate employment and other economic benefits in their own right. With the third bullet applying as at present to town centres it will also present a barrier to residential development in a sustainable location which will also support town centre vitality and viability. Re-population of town centres is generally considered a desirable; adding to the activity in the centre, facilitating the redevelopment or re-use of under-used or vacant sites and buildings; in a sustainable location. The NPPF recognises the need for planning policy to react quickly to the changing economic climate, which will be prevented with the policy as currently worded. It therefore runs counter to the NPPF.
**Comment ID:** SQLP16/592  **Respondent:** 14143457 / Hermes Investment Management Limited  **Agent:** Turley (P Keywood)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** (No)

Please refer to the Turley letter dated 18 July 2016 submitted on behalf of Hermes for detailed comments.

The letter is uploaded under Question 7 of the Consultation Questionnaire.

The letter addresses concerns relating to the following evidence base documents:
- Guildford Borough ‘Land Availability Assessment (LAA)’ dated February 201
- Guildford Borough Strategic Flood Risk Assessment January 2016
- Sustainability Appraisal of the Guildford Borough Local Plan carried out by Aecom
- Guildford Borough Council Flood Risk Sequential and Exception Test document, May 2016

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Attached documents:**
- HERL2015_LT_180716_Representation_Letter_to_Draft_Local_Plan_on_behalf_of_Hermes.pdf (95 KB)
- HERL2015_Representation_of_behalf_of_Hermes__WaterCo_Flood_Risk_Assessment_w10122160718FRA.pdf (4.2 MB)

**Comment ID:** SQLP16/593  **Respondent:** 14143457 / Hermes Investment Management Limited  **Agent:** Turley (P Keywood)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): (No)

Please refer to the Turley letter dated 18 July 2016 submitted on behalf of Hermes for detailed comments. The letter is uploaded under Question 7 of the Consultation Questionnaire. The letter explains the reasons why it is considered that the plan is not sound and the changes considered necessary to make it sound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/594  Respondent: 14143457 / Hermes Investment Management Limited  Agent: Turley (P Keywood)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

Hermes Investment Management Limited wishes to be participate in the Examination for the Proposed Submission Local Plan on grounds it is a stakeholder in a key site within Guildford Town Centre and would welcome the opportunity to test the Council's position on the elements of the plan, particularly site allocations which are the subject of the representations it has made.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/595  Respondent: 14143457 / Hermes Investment Management Limited  Agent: Turley (P Keywood)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)
Please refer to the Turley letter dated 18 July 2016 submitted on behalf of Hermes Investment Management for detailed comments.

Please also refer to the Site Plan which forms part of the representation, plus the Preliminary Flood Risk Assessment prepared by WaterCo.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- HERL2015 LT 18-07-16 Representation Letter to Draft Local Plan on behalf of Hermes.pdf (95 KB)
- HERL2015 Representation of behalf of Hermes - WaterCo Flood Risk Assessment w10122-160718-FRA.pdf (4.2 MB)
- HERL2015 Representation on behalf of Hermes Site Plan.pdf (149 KB)

Comment ID: PSLPA16/736  Respondent: 14149857 / GBC (Caroline Reeves)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix A: Glossary

Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (Yes), is Legally Compliant? (Yes)

Answer (if comment is on questions 1-7 of the questionnaire): ()

The DPDs will be hugely important and should be the key to the success of any scheme or application. Hopefully they will cover in detail the key issues of design, heritage, vernacular architecture, sustainability etc etc. Should this be more clearly defined here?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1199  Respondent: 14149857 / GBC (Caroline Reeves)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (Yes), is Legally Compliant? (Yes)

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a ward councillor for a town centre ward that will have a high number of new homes, my concern is that we are able to maintain the best in design and detailing, maintaining quality rather than quantity. Any development will add stress and strain to the current over stretched transport infrastructure, so we must make sure that we have assurances regarding the highways/transport improvements. Can we be certain of this before having to commit to developments?

Of course the other concern for all urban residents is that the loss in housing numbers in any of the strategic sites will mean more intensive development in the urban areas unless we can reduce our total housing need.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2373  Respondent: 14149857 / GBC (Caroline Reeves)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (Yes), is Legally Compliant? (Yes)

Answer (if comment is on questions 1-7 of the questionnaire): ( )

The supply of a wide range of housing is an essential part of the plan, in all parts of the borough. Villages are in need of new, small, lower cost housing just as much as there is a need in the urban area. The policies appear to cover all styles and types of housing, the key will be when we have planning applications, that we are able to convince developers of our need rather than what will give them the highest return. What can be done to strengthen this? The need for 'affordable housing' is surely known by all, the difficulty is in the supply. As an authority we must continue to build social housing wherever we can, although the cost and supply of the land remains our biggest challenge. Central government policy does not help us in any regard with our housing issues, on the one hand demanding we build to meet our need and on the other proclaiming the need to protect the green belt. To fulfil the first demand destroys the other.

I particularly welcome the comments regarding the importance of the effect of HMOs on surrounding homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3720  Respondent: 14153793 / Paul Howarth  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
I strongly object to the inclusion of the Normandy greenfield site(s) and its developer led proposal for the 1000 or so new properties.

Whist progress needs to be made, It is grossly unfair on the village to subject the residents( the people you represent) to the desecration of the villages current character.

As a newer member to the village, I have been overwhelmed by the beautiful - often under rated character of the village. So do not wish for a developer to lead Guildford down this one way street and ultimately Normandy to become an urban sprawling mass of houses as the planning floodgates are opened.

**Schooling**

I also object to the placement of a large secondary school in the village, it's extremely out of character for the area, I have a young baby who will eventually go to secondary school. Whereby a train or bus to an existing secondary school is, and will not be an issue for us.

**Road System**

I also object on the matter that the local road system is already saturated to capacity. I suspect many of the potential purchasers of the new homes will commute, with the likely hood of at least two cars per household. This is likely to subject the current and new residents to major traffic issues. Which the council will need to resolve at their expense rather then the developers (that certainly won't be cheaper then a new school).

The main roads are so narrow that a car generally can't pass a cycle without crossing the centre line on the main routes, which is almost impossible anyway when rush hour traffic ensues.

It is sometimes quicker for me to get to London Waterloo then drive a few miles down the road. Which is to say the least, incredible!

This is only going to be made much worse with more cars on the road and no significant overhaul to the infrastructure (who will pay for that?).

**Finally:**

These large scale (developer led) housing proposals are not what Guildford needs. I believe Guildford is quite different to other urban towns, and is locally unique due to its greater swathes of Greenbelt land which washes over the area. Why on Earth turn it into another urban mass of houses and destroy its identity forever more.

I am sure with additional effort and **collaboration** a better solution for all would prevail, not just because a developer is building a free school...

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/1994  **Respondent:** 14175713 / Maggie Slattery  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views form the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/45  Respondent: 14175713 / Maggie Slattery  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2700  Respondent: 14177217 / Michael Forster  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We wish to respond with our comments to the Draft Local Plan as follows:

- Generally we support the views of the Guildford Residents Association.

We oppose Guildford expanding by a quarter without full and proper consideration being given to increases and drastic improvements to the infrastructure that is required and a full commitment to implement them ahead of any new development taking place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4182  Respondent: 14177313 / Ian Macpherson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 146 Site Allocation A1 The Plaza

Draft schemes so far show development whose bulk impinges on the environment eg town views and neighbouring listed buildings. The proposed increase in number of dwellings suggested would appear to endorse this overdevelopment. Obj – maintain original figure. If a developer is able to show that the higher figure can be achieved without harm, then so-be-it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4184  Respondent: 14177313 / Ian Macpherson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 198- Site Allocation A25 Gosden Hill Farm.

Have previously [2016] entered the strongest objections to this development, on the grounds that it will significantly cross criteria in NPPF para 80 and 84, and most significantly para 109 point 1 “valued landscape” - as the view of the North Downs from the A3 is. There does not seem to be a case here for this substantial Green Belt removal and development except housing need, which by itself has not been supported at Enquiry or in the Courts.
As for the amended proposal here, I note it has gained a major employment activity [7000 sq. m.] at the north [the A3 side] of the site, which, prima-facie, would make commercial buildings -as at Woodbridge flyover – the major impact on the view from the A3.

**Obj maintained, supplemented by specific obj to `employment` north [i.e. next to A3 view].**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp172/4180  **Respondent:** 14177313 / Ian Macpherson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Page 144 Site allocation A46 Normandy**

Not clear why this land has been removed. In principle it would seem highly suitable.

**Strong Obj - maintain A46.**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp171/2438  **Respondent:** 14177313 / Ian Macpherson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Page 109 POLICY D2 Sustainable Design**

Much of this section could be ‘unsustainable’ legally as it stands. The text would possibly benefit from a study of the careful drafting of the Building Regulations. An example is the deletion of “that are achievable” in 1(c). That leaves an open-ended requirement that could be taken to mean the wholly closed levels that manned space craft achieve.

**Obj – carefully re-draft.**
Para (7) would, as written, require new dwellings everywhere [eg the country ends of East Horsley] to be ‘connection-ready’. It has to be understood that ‘connection-ready’ means a sizing of heating systems appropriate for {C}CHP, and so probably unsuitable for whatever is a more suitable method for the location [eg maybe heat pumps].

Redraft?

Para (9) now specifies a carbon emission reduction of 20% on-what? [presumably the Building Regulations, but it should say so].

It remains wholly unclear why this figure was chosen. The supporting papers contain a study which costs the extra works required – this form of study has been carried out multiple times by various authorities, there is nothing unusual about Guildford and there seems no reason therefore why Guildford should have funded a further study, with perhaps its own set of potential errors. In depth studies are always carried out by the Government’s Building Regulation Advisory Committee – most are published and linked research reports are available. Those give reasoned explanation as to choice, and it would obviously be helpful to Members if these were abstracted and made available if members are insistent on going down a particularly pace-setting path.

Meanwhile Members should be aware that there are widespread reports in the industry of building failures arising out of energy conservation requirements running ahead of the ability of the majority of designers and constructors. And of failure, sometimes remarkable failure, to achieve predicted savings, arising out of the inability of building users to use to the full what has been supplied to them.

A graphic, terrible example, is a recent fire in a high block of flats, where externally applied thermal insulation applied to upgrade the energy conservation of that block largely caused a major human tragedy. The most efficient thermal insulation nearly always is highly flammable.

It would be far more sensible, if more boring, to follow national guidance.

Obj - reconsider

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2433  Respondent: 14177313 / Ian Macpherson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 38 para 4.2.8 Density

Not clear why this has been deleted, though some of the material is repeated elsewhere.

Obj. Replace please

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2435  Respondent: 14177313 / Ian Macpherson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 49 para 4.2.54

Not clear why this paragraph re ‘cascade’ provisions has been deleted. It is long standing and seems eminently sensible. Is it because of Appeal or Court decisions? If not-

Obj as comment above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2440  Respondent: 14177313 / Ian Macpherson  Agent:
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<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID2</th>
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<tr>
<th>Page 127</th>
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<tr>
<td>para 4.6.18 – am I to understand that the “Tunnel” option is no longer under consideration? If this is the case, the Plan should say so, for much hangs on A3 capacity and implications for works.</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<th>Page 51 – Policy P1 – AGLV</th>
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<tbody>
<tr>
<td>Pleased to see the presently ambiguous status of AGLV being addressed.</td>
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<tr>
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</tbody>
</table>
The figures for housing in the table come, I believe, from a study by the Council’s Consultant. I have been told that the methodology behind this study is commercially confidential [which is, perhaps, worrying?]. I have now seen the study for EGA by Neil McDonald, which shows, with reasoned argument, a substantially lower set of figures. I regard the McDonald study as the more credible of the two and Obj. in the first instance if it is not taken as the basis of the Local Plan table.

However I understand that the Government is preparing a standardised method of calculating housing demand, will publish shortly, and intends to make it more-or-less compulsory on publication. It seems unlikely that this will remain unchallenged [more particularly since recent figures on immigration, etc, show potentially substantial trend changes].

Any Local Plan publication of Housing Targets should therefore be heavily qualified [eg noted as subject to amendment as more information comes available].

In practical terms, the phasing of the first five years in the Council table seems not radically different from the McDonald study, so the arguments on phasing of site availability are mutual. It is later where there are significant differences.

In passing I do caution about the presentation of final digits in matters such as population predictions. The 4.1.9a sum figure is 12,426 homes. “6” exactly ??? Figures like this really ought to be presented with standard statistical error statements.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPS16/1241  **Respondent:** 14181313 / Vision for Guildford Ltd - GVG (William Stokoe)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Introduction

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

The Guildford Vision Group, a group of concerned residents with very relevant commercial and professional experience, was established four years ago to press for reinvigoration of the town centre. Specifically we have called for six objectives:

1. Wider pedestrianisation of the town centre
2. Exciting new public space along a reinvigorated riverside
3.Redirection of vehicle traffic away from the centre
4. An integrated transport hub and interchange around the rail station
5. New town centre housing
6. A new and better East-West link

These are not unusual or unique objectives. They are the aim of a multitude of UK towns and cities, where many have taken positive action to bring them about. Many would envy Guildford its magnificent setting and the river running through the centre of town, yet Guildford has failed significantly over the past decades to take full advantage of its potential, especially its river. Riverside areas are taken up by surface car parks, buildings with their back to the water and suffer a legacy of piecemeal, unattractive light industrial development. Walnut Tree Close and Woodbridge Meadows, in particular, should be given over to well-planned housing and the scattered light industrial provision should be relocated to an expanded Slyfield where infrastructure and communications would be better.
We are thus disappointed by the lack of real ambition and aspiration in the Local Plan in respect of the town centre. There are no substantial coordinated policies or strategies in the Local Plan that will achieve the six objectives above. These objectives have received wide public support, as recognised by:

- Our 2013 document ‘Guildford on the Way’, a Vision for Guildford in 2030 (attached) as articulated by members of the public, Guildford residents and our members
- Comments and feedback from our public meetings over the past four years that have regularly attracted audiences of 200 and above
- Feedback from our frequent Newsletters to our supporters, interested parties and councillors

The council, in response to our lobbying, commissioned a masterplan for the centre. The masterplan was drawn up by Allies & Morrison, nationally-renowned masterplanners. The masterplan was approved by the council in March 2016 but is yet to be adopted. There is little recognition or acknowledgement of the masterplan in either the Local Plan policies, underpinning information or implementation strategies. We understand that the council propose an Area Action Plan (AAP) for the town centre once the Local Plan is adopted. We are concerned that the AAP will be subject to challenge if its aims are not foreshadowed in the Local Plan. We believe omission of any mention of the AAP could render the Local Plan unsound in this respect.

Thus all the sites below should form part of a coherent plan, in line with the approved Town Centre Masterplan.

A1: The Plaza, Portsmouth Road
A2: Guildford Cinema, Bedford Road
A3: Land between Farnham Road and the Mount
A4: Telephone Exchange, Leapale Road
A5: Jewsons, Walnut Tree Close
A6: North Street redevelopment
A7 Land at Guildford railway station
A8: Land west of Guildford railway station
A9: 77 to 83 Walnut Tree Close
A11: Guildford Park Car Park
A13: Kernal Court, Walnut Tree Close
A14: Wey Corner, Walnut Tree Close
A15: Land at Guildford Cathedral

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2482  Respondent: 14181313 / Vision for Guildford Ltd - GVG (William Stokoe)  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

GVG is pro—growth and supports good, well designed development. Guildford Town Centre is about to undergo a sustained period of significant development, including creation of an additional 48,000sq m of retail and related space, principally via the redevelopment of North Street. It is hard, if not impossible, to discern from the Local Plan how such considerable development will be served by appropriate infrastructure. It is not clear what public benefits will accrue in the shape of new public space and better public realm. There is no sense of an overarching plan or design ethos that will support and enhance the historic core of the town that makes it so attractive to its residents and to a wide range of visitors.

In a well-meaning, almost obsessive, focus on its sustainable movement corridor and modal shift, the council leaves itself unfortunately blind to the need now for a modern transport interchange in the centre of town around the railway station. Guildford holds a key strategic position halfway between Heathrow and Gatwick airports and should seize all the opportunities that airport expansion will bring. The Local Plan has little if any comment or concrete plans regarding the rearrangement of bus services necessitated by the North St development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2484  Respondent: 14181313 / Vision for Guildford Ltd - GVG (William Stokoe)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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These are not unusual or unique objectives. They are the aim of a multitude of UK towns and cities, where many have taken positive action to bring them about. Many would envy Guildford its magnificent setting and the river running through the centre of town, yet Guildford has failed significantly over the past decades to take full advantage of its potential, especially its river. Riverside areas are taken up by surface car parks, buildings with their back to the water and suffer a legacy of piecemeal, unattractive light industrial development. Walnut Tree Close and Woodbridge Meadows, in particular, should be given over to well-planned housing and the scattered light industrial provision should be relocated to an expanded Slyfield where infrastructure and communications would be better suited.
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2476  Respondent: 14181313 / Vision for Guildford Ltd - GVG (William Stokoe)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Walnut Tree Close and Woodbridge Meadows, in particular, should be given over to well-planned housing and the scattered light industrial provision should be relocated to an expanded Slyfield where infrastructure and communications would be better.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2477  Respondent: 14181313 / Vision for Guildford Ltd - GVG (William Stokoe)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Walnut Tree Close and Woodbridge Meadows, in particular, should be given over to well-planned housing and the scattered light industrial provision should be relocated to an expanded Slyfield where infrastructure and communications would be better.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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The level and importance of development to the West of the town since 1840 should surely suggest a need for another link. The town centre and Guildford’s health and economy is at a disadvantage from inadequate and imperfect links to key sites such as the Royal Surrey Hospital, Surrey University, the Research Park with its world class and world leading facilities and activities. If large housing development is to be accommodated to the West of the town then there should be adequate provision for the inevitable increase in consequent vehicular traffic from such development, irrespective of the impact of modal shift and sustainable movement policies. Guildford is a gap town, with topographic constraints on solutions such as a ring road. The beauty of its setting also provides constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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It is hard, if not impossible, to discern from the Local Plan how such considerable development will be served by appropriate infrastructure. It is not clear what public benefits will accrue in the shape of new public space and better public realm. There is no sense of an overarching plan or design ethos that will support and enhance the historic core of the town that makes it so attractive to its residents and to a wide range of visitors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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We made a lengthy response to the Reg 18 consultation nearly 2 years ago. Our comments remain very relevant and are re-submitted for the Reg 19 consultation.

The Local Plan leaves a real vacuum in respect of the town centre and leaves it vulnerable to uncoordinated, opportunistic development. It will have no credible, well-articulated policies to forestall such development or any distinctive guide for development that will ensure the long run sustainability of the town centre and its economy.
The single, most significant omission regarding the town centre and its infrastructure is a cohesive plan to redirect traffic away from the centre via a new East/West link as proposed by GVG. This was mentioned in our previous Local Plan 2014 submission. A sketch of the link is reproduced here with the new rail/river bridge arrowed:

[see attached file 'GVG bridge route.jpeg']

Such a link would instantly enable wider pedestrianisation of the town centre – specifically Bridge and Onslow Streets – bringing a safer, less polluted environment. The bridge would also enable the reinvigoration of the riverside on both sides, below the bottom of North and High Streets, and the demolition of the ugly four lane concrete Friary Bridge that blights the character of our historic gap town at its very centre.

There is no attempt in the Local Plan to safeguard any potential route for such a new East/West link.

There has been no new town centre East/West link across the railway and river since the building of the Farnham Road Bridge in the 1840s. The Farnham Road bridge capacity is constrained, is rapidly approaching the end of its safe life and is too low for modern rail freight traffic (as set out in the rail ‘Wessex Plan’).

The level and importance of development to the West of the town since 1840 should surely suggest a need for another link. The town centre and Guildford’s health and economy is at a disadvantage from inadequate and imperfect links to key sites such as the Royal Surrey Hospital, Surrey University, the Research Park with its world class and world leading facilities and activities. If large housing development is to be accommodated to the West of the town then there should be adequate provision for the inevitable increase in consequent vehicular traffic from such development, irrespective of the impact of modal shift and sustainable movement policies. Guildford is a gap town, with topographic constraints on solutions such as a ring road. The beauty of its setting also provides constraints.

Within a wider pedestrianisation in the town centre there should be provision for better pedestrian routes to the Cathedral and University. The Local Plan makes no attempt to achieve that, to the detriment of the town and its sense of community.

GVG is pro—growth and supports good, well designed development. Guildford Town Centre is about to undergo a sustained period of significant development, including creation of an additional 48,000sq m of retail and related space, principally via the redevelopment of North Street. It is hard, if not impossible, to discern from the Local Plan how such considerable development will be served by appropriate infrastructure. It is not clear what public benefits will accrue in the shape of new public space and better public realm. There is no sense of an overarching plan or design ethos that will support and enhance the historic core of the town that makes it so attractive to its residents and to a wide range of visitors.

In a well-meaning, almost obsessive, focus on its sustainable movement corridor and modal shift, the council leaves itself unfortunately blind to the need now for a modern transport interchange in the centre of town around the railway station. Guildford holds a key strategic position halfway between Heathrow and Gatwick airports and should seize all the opportunities that airport expansion will bring. The Local Plan has little if any comment or concrete plans regarding the rearrangement of bus services necessitated by the North St development.

Sadly the Guildford Vision Group therefore finds the Local Plan unsound, inadequate and unambitious in respect of the town centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
GVG is pro—growth and supports good, well designed development. Guildford Town Centre is about to undergo a sustained period of significant development, including creation of an additional 48,000sq m of retail and related space, principally via the redevelopment of North Street. Development includes additional new town centre housing, including much needed affordable, all of which we support. It is hard, if not impossible, to discern from the Local Plan how such considerable development will be served by appropriate infrastructure. It is not clear what public benefits will accrue in the shape of new public space and better public realm. There is no sense of an overarching plan or design ethos that will support and enhance the historic core of the town that makes it so attractive to its residents and to a wide range of visitors.

Walnut Tree Close and Woodbridge Meadows, in particular, should be given over to well-planned housing and the scattered light industrial provision should be relocated to an expanded Slyfield where infrastructure and communications would be better.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2475   Respondent: 14181313 / Vision for Guildford Ltd - GVG (William Stokoe)   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
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[see attached file 'GVG bridge route.jpeg']

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There is no attempt in the Local Plan to safeguard any potential route for such a new East/West link.

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The level and importance of development to the West of the town since 1840 should surely suggest a need for another link. The town centre and Guildford’s health and economy is at a disadvantage from inadequate and imperfect links to key sites such as the Royal Surrey Hospital, Surrey University, the Research Park with its world class and world leading facilities and activities. If large housing development is to be accommodated to the West of the town then there should be adequate provision for the inevitable increase in consequent vehicular traffic from such development, irrespective of the impact of modal shift and sustainable movement policies. Guildford is a gap town, with topographic constraints on solutions such as a ring road. The beauty of its setting also provides constraints.

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Attached documents: GVG bridge route.JPG (58 KB)
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There is no sense of an overarching plan or design ethos that will support and enhance the historic core of the town that makes it so attractive to its residents and to a wide range of visitors.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/2473  **Respondent:** 14181313 / Vision for Guildford Ltd - GVG (William Stokoe)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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We made a lengthy response to the Reg 18 consultation nearly 2 years ago. Our comments remain very relevant and are re-submitted for the Reg 19 consultation.

The Local Plan leaves a real vacuum in respect of the town centre and leaves it vulnerable to uncoordinated, opportunistic development. It will have no credible, well-articulated policies to forestall such development or any distinctive guide for development that will ensure the long run sustainability of the town centre and its economy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/577  Respondent: 14181313 / Vision for Guildford Ltd - GVG (William Stokoe)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

The Guildford Vision Group, a group of concerned residents with very relevant commercial and professional experience, was established four years ago to press for reinvigoration of the town centre. Specifically we have called for six objectives:

1. Wider pedestrianisation of the town centre
2. Exciting new public space along a reinvigorated riverside
3. Redirection of vehicle traffic away from the centre
4. An integrated transport hub and interchange around the rail station
5. New town centre housing
6. A new and better East-West link

We are thus disappointed by the lack of real ambition and aspiration in the Local Plan in respect of the town centre. There are no substantial coordinated policies or strategies in the Local Plan that will achieve the six objectives above. These objectives have received wide public support, as recognised by:

- Our 2013 document ‘Guildford on the Way’, a Vision for Guildford in 2030 (attached) as articulated by members of the public, Guildford residents and our members
- Comments and feedback from our public meetings over the past four years that have regularly attracted audiences of 200 and above
- Feedback from our frequent Newsletters to our supporters, interested parties and councillors

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Comment ID:** SQLP16/578  **Respondent:** 14181313 / Vision for Guildford Ltd - GVG (William Stokoe)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** (No)

We understand that the council propose an Area Action Plan (AAP) for the town centre once the Local Plan is adopted. We are concerned that the AAP will be subject to challenge if its aims are not foreshadowed in the Local Plan. We believe omission of any mention of the AAP could render the Local Plan unsound in this respect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** SQLP16/579  **Respondent:** 14181313 / Vision for Guildford Ltd - GVG (William Stokoe)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** (No)

The Guildford Vision Group understands that the council propose an Area Action Plan (AAP) for the town centre once the Local Plan is adopted. We are concerned that the AAP will be subject to challenge if its aims are not foreshadowed in the Local Plan. We believe omission of any mention of the AAP could render the Local Plan unsound in this respect.

The Local Plan leaves a real vacuum in respect of the town centre and leaves it vulnerable to uncoordinated, opportunistic development. It will have no credible, well-articulated policies to forestall such development or any distinctive guide for development that will ensure the long run sustainability of the town centre and its economy.

Sadly the Guildford Vision Group therefore finds the Local Plan unsound, inadequate and unambitious in respect of the town centre.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
The Guildford Vision Group would like to challenge elements of the Local Plan at the Examination, and would wish to be accompanied by expert witnesses where appropriate, especially in connection with town centre infrastructure matters.

The Guildford Vision Group, a group of concerned residents with very relevant commercial and professional experience, was established four years ago to press for reinvigoration of the town centre. Specifically we have called for six objectives:

1. Wider pedestrianisation of the town centre
2. Exciting new public space along a reinvigorated riverside
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4. An integrated transport hub and interchange around the rail station
5. New town centre housing
6. A new and better East-West link

These are not unusual or unique objectives. They are the aim of a multitude of UK towns and cities, where many have taken positive action to bring them about. Many would envy Guildford its magnificent setting and the river running through the centre of town, yet Guildford has failed significantly over the past decades to take full advantage of its potential, especially its river. Riverside areas are taken up by surface car parks, buildings with their back to the water and suffer a legacy of piecemeal, unattractive light industrial development.

Walnut Tree Close and Woodbridge Meadows, in particular, should be given over to well-planned housing and the scattered light industrial provision should be relocated to an expanded Slyfield where infrastructure and communications would be better.

We are thus disappointed by the lack of real ambition and aspiration in the Local Plan in respect of the town centre. There are no substantial coordinated policies or strategies in the Local Plan that will achieve the six objectives above. These objectives have received wide public support, as recognised by:
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The Local Plan leaves a real vacuum in respect of the town centre and leaves it vulnerable to uncoordinated, opportunistic development. It will have no credible, well-articulated policies to forestall such development or any distinctive guide for development that will ensure the long run sustainability of the town centre and its economy.

The single, most significant omission regarding the town centre and its infrastructure is a cohesive plan to redirect traffic away from the centre via a new East/West link as proposed by GVG. This was mentioned in our previous Local Plan 2014 submission. A sketch of the link is reproduced here with the new rail/river bridge arrowed:

[see attached file GVG bridge route]

Such a link would instantly enable wider pedestrianisation of the town centre – specifically Bridge and Onslow Streets – bringing a safer, less polluted environment. The bridge would also enable the reinvigoration of the riverside on both sides, below the bottom of North and High Streets, and the demolition of the ugly four lane concrete Friary Bridge that blights the character of our historic gap town at its very centre.

There is no attempt in the Local Plan to safeguard any potential route for such a new East/West link.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: GVG bridge route.jpg (58 KB)

Comment ID: SQLP16/582  Respondent: 14181313 / Vision for Guildford Ltd - GVG (William Stokoe)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

Below is the complete Guildford Vision Group Reg 19 consultation submission:

The Guildford Vision Group, a group of concerned residents with very relevant commercial and professional experience, was established four years ago to press for reinvigoration of the town centre. Specifically we have called for six objectives:

1. Wider pedestrianisation of the town centre
2. Exciting new public space along a reinvigorated riverside
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- Comments and feedback from our public meetings over the past four years that have regularly attracted audiences of 200 and above
- Feedback from our frequent Newsletters to our supporters, interested parties and councillors

The council, in response to our lobbying, commissioned a masterplan for the centre. The masterplan was drawn up by Allies & Morrison, nationally-renowned masterplanners. The masterplan was approved by the council in March 2016 but is yet to be adopted. There is little recognition or acknowledgement of the masterplan in either the Local Plan policies, underpinning information or implementation strategies. We understand that the council propose an Area Action Plan (AAP) for the town centre once the Local Plan is adopted. We are concerned that the AAP will be subject to challenge if its aims are not foreshadowed in the Local Plan. We believe omission of any mention of the AAP could render the Local Plan unsound in this respect.

We made a lengthy response to the Reg 18 consultation nearly 2 years ago. Our comments remain very relevant and are re-submitted for the Reg 19 consultation.

The Local Plan leaves a real vacuum in respect of the town centre and leaves it vulnerable to uncoordinated, opportunistic development. It will have no credible, well-articulated policies to forestall such development or any distinctive guide for development that will ensure the long run sustainability of the town centre and its economy.

The single, most significant omission regarding the town centre and its infrastructure is a cohesive plan to redirect traffic away from the centre via a new East/West link as proposed by GVG. This was mentioned in our previous Local Plan 2014 submission. A sketch of the link is reproduced here with the new rail/river bridge arrowed:

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There is no attempt in the Local Plan to safeguard any potential route for such a new East/West link.

There has been no new town centre East/West link across the railway and river since the building of the Farnham Road Bridge in the 1840s. The Farnham Road bridge capacity is constrained, is rapidly approaching the end of its safe life and is too low for modern rail freight traffic (as set out in the rail ‘Wessex Plan’).

The level and importance of development to the West of the town since 1840 should surely suggest a need for another link. The town centre and Guildford’s health and economy is at a disadvantage from inadequate and imperfect links to key sites such as the Royal Surrey Hospital, Surrey University, the Research Park with its world class and world leading facilities and activities. If large housing development is to be accommodated to the West of the town then there should be adequate provision for the inevitable increase in consequent vehicular traffic from such development, irrespective of the impact of modal shift and sustainable movement policies. Guildford is a gap town, with topographic constraints on solutions such as a ring road. The beauty of its setting also provides constraints.

Within a wider pedestrianisation in the town centre there should be provision for better pedestrian routes to the Cathedral and University. The Local Plan makes no attempt to achieve that, to the detriment of the town and its sense of community.
GVG is pro—growth and supports good, well designed development. Guildford Town Centre is about to undergo a sustained period of significant development, including creation of an additional 48,000sq m of retail and related space, principally via the redevelopment of North Street. Development includes additional new town centre housing, including much needed affordable. It is hard, if not impossible, to discern from the Local Plan how such considerable development will be served by appropriate infrastructure. It is not clear what public benefits will accrue in the shape of new public space and better public realm. There is no sense of an overarching plan or design ethos that will support and enhance the historic core of the town that makes it so attractive to its residents and to a wide range of visitors.

In a well-meaning, almost obsessive, focus on its sustainable movement corridor and modal shift, the council leaves itself unfortunately blind to the need now for a modern transport interchange in the centre of town around the railway station. Guildford holds a key strategic position halfway between Heathrow and Gatwick airports and should seize all the opportunities that airport expansion will bring. The Local Plan has little if any comment or concrete plans regarding the rearrangement of bus services necessitated by the North St development.

Sadly the Guildford Vision Group therefore finds the Local Plan unsound, inadequate and unambitious in respect of the town centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to Guildford Borough Council’s changes to the draft local plan and the continued inclusion of Blackwell Farm as a development site (Policy A26 & para 4.1.9) in the draft local plan.

Policy A26 offers the opportunity for developers to make profit through delivering new houses but does not require them to sufficiently fund and/or develop and/or maintain the necessary and sufficient infrastructure that would be needed to properly connect the Blackwell farm development with the rest of Guildford and ensure its success. Without such an infrastructure requirement and funding from the housing developers, current local residents of Onslow Village and Compton will be severely impacted, both during the build/development phase and afterwards once the new houses are occupied. The current infrastructure is already inadequate for the current residents and users on the western side of Guildford – adding 1,800 more homes will have a severe impact; developers should not be allowed to benefit at all at the expense of the current community on to which the Blackwell Farm estate will join.

I object to the planned access from the A31 to Blackwell Farm for a number of reasons, and not least because it is situated in an AONB, including the following:

- It is neither funded nor planned in sufficient detail to prevent even more congestion on the A31 and the A31 Down’s Lane Junction which is now severely dangerous during morning and evening rush hour
- the A31 into Guildford from the proposed junction is not capable of handling an increase in heavy lorries, nor is the city centre gyratory For this to be one of only 2 access points, the A31 from the City Centre should be upgraded, or current traffic re-routed off it
- LRN3 (Signalized junction on A31) as defined in Guildford Borough’s 2016 Transport Strategy does not have confirmed funding and is not planned for delivery until Policy A26 has not specified the junction to be complete before the housing development starts which will create a massive impact for current commuters and road users on the A31 as developer lorries and vehicles seek access to the site for the next 10 years. Without a controlled junction, it will be dangerous to access from the west bound carriageway of the A31 and cause even more traffic congestion and pollution than is currently experienced
- LRN3 should not be installed until the A3 development programme has a clear plan and funding, including how any interchange between the A3 and A31 will There is a major lack of both detail and contingency planning on this in the Guildford Borough 2016 Transport Strategy; there is only the un-funded and un-defined A3 widening (SRN2) scheme and the aspirational A3 tunnel (SRN10) scheme and nothing in between.

The creation of homes alone will not help the current or future community in this part of Guildford:

- The retail and community allocations described in Policy A26 are miniscule compared to the need of the planned residents, who will want access to better transport, shopping and community facilities (cinemas, restaurants etc) e. all those facilities located in the centre of Guildford
- 1,800 homes will add an additional 2,000 cars1* to already congested and under-funded roads
- The Council’s suggestion that the new residents of Blackwell farm will not have need to travel outside the area is misguided and ill-informed
- Hence the need to thoroughly define and fund sustainable roads and transport infrastructure in advance of any housing strategy to develop the land

No detail is present in the draft local plan and policy A26 into the way today’s communities will exist in the future, nor are there requirements in Policy A26 to deliver infrastructure that will be suitable for future living. The addition of an “opportunities” paragraph in the latest version of the policy A26 are not requirements and will therefore not be delivered by any developer or involved party:
• where are the specific requirements for cycle lanes and cycle paths to help people commute locally in safety, without having to compete with traffic on the over-congested roads?; the A31 from the top of the Hogs Back into Guildford is a “death-trap” for The current defined “cycle ways” from the Mount to the Hogs Back is a potholed, dirt track which is un-navigable to all normal road and hybrid bikes during winter.

• where are the specific requirements to maintain footpaths for pedestrians to walk into Guildford? The current footpath on the A31 is too narrow, in bad disrepair and too dangerous for pedestrians to use to walk from High View Road into the City Centre.

• the growth in internet shopping and home deliveries This creates more need for better roads and access for online suppliers/delivery firms as well as better/faster online access.

• where is the requirement and commitment/investment to install super-fast broadband (100Mbps+)? The western side of Onslow village stretching up the A31 to Compton currently only gets 1Mbps connection, which frequently fails during peak The OpenReach projects to install superfast broadband for 450 current homes2* are all underfunded and behind their planned project delivery timescales.

The draft local plan and the various other Council strategy documents and policies governing road-use and transportation in and around Guildford are not joined-up. This is a problem throughout the whole governance/government of the areas development.

• The key strategic road is the A3 (and with it trouble-free access in/out of Guildford), although suggested improvements are neither planned nor funded; they are merely wish-list items, and Highways Agency are Without a properly functioning multi-lane highway connecting Guildford to the rest of the South East and UK, Guildford’s inner roads will become more congested than they currently are now, increasing journey times and polluting the environment. The current access on and off the A3 at the western side of Guildford is inadequate and very dangerous in places. Adding more houses will just compound the problem.

• The plan to improve traffic flows through Guildford city centre is not yet agreed or Without such plans, the traffic on the A31 will become more congested than current and the pollution levels will not be brought below the necessary standards.

Policy A26 is not sufficiently funded and not adequately specified to prevent profit taking by land-owners and builders at the expense of the local community and Guildford Council itself. A strategy to build 1,800 homes on a single plot next to Guildford where all infrastructure is already under severe pressure will not work unless all interested parties have their goals aligned.

If such large housing developments are needed – and that is debatable - then I strongly suggest that it is a requirement that no profit should be allowed to be created/distributed from Policy A26 until the impact of the new homes has been experienced and the necessary investment in infrastructure to at least maintain, and ideally improve the whole of the area is secured and delivered. This should be about developing an expanding community for current and future residents, not just about building houses to meet some statistical need.


2 Cabinet 95 and 97 are not fibre enabled; despite the project to fibre enable Guildford area commencing in 2011. Source: https://www.telecom-tariffs.co.uk/codelook.htm?xid=545597&cabinets=12269

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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- The plan to improve traffic flows through Guildford city centre is not yet agreed or funded. Without such plans, the traffic on the A31 will become more congested than current and the pollution levels will not be brought below the necessary standards

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Footnotes

2 Cabinet 95 and 97 are not fibre enabled; despite the project to fibre enable

Guildford area commencing in 2011. Source: https://www.telecomtariffs.co.uk/codelook.htm?xid=545597&cabinets=12269

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Housing numbers:

Regarding housing numbers the Strategic Housing Market Assessment has given a housing need of 693 per year, this is far too high and is double the figure given just 4 years ago.

Guildford Borough Council have not given details of how the figures have been calculated, the report is therefore unaccountable so should not be used.

The SHMA is fundamentally flawed, historical errors have not been corrected, there are issues over student housing requirements and errors in the estimation of homes needed to support growth.

By contrast the independent report by Guildford Residents Association comes up with a much lower figure of 510.

All other boroughs have reduced the figure that their SHMA came up with, Guildford have taken the highest number. Why have Guildford not constrained the figure?

The proposed 14,000 homes is a massive increase on the current housing stock, this is overdevelopment and is unsustainable. No justification has been put forward for such a massive increase in one town

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Gosden Hill Farm:

This massive proposed development will have a huge impact on Burpham, the proposal is to effectively double the size of Burpham. This is a major assault on a village area on the outskirts of town. Burpham is already congested particularly at peak times, adding to this 2000 houses, a 1000 car park and ride, 2 schools and perhaps a station will add thousands more car movements to an already congested road network. The increase in solution is unacceptable.

Gosden Hill is in the Green Belt, the topography of the hill means it is a very visible site when driving on the A3. Development of these green fields will spread the urban sprawl in a very visible manor significantly up the A3.
A large portion of the traffic from this massive site will head towards Guildford via the roads through Burpham, this is already congested and will simply not cope with the increase, moreover the pollution of near stationary cars will blight the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/11148</th>
<th>Respondent: 14188833 / Graham Mills</th>
<th>Agent:</th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

Transport:

The evidence on future traffic conditions which has been provided in the Strategic Highway Assessment Report was produced late and is incomplete. Critical information on congestion has not been given in time to be taken into account in the plan proposals.

The proposed Sustainable Movement Corridor is simple unsound and cannot be delivered due to the narrow roads and pinch points on an already very congested route through Burpham.

Of further note is that the proposed Gosden Hill development of 2000 houses plus offices, school etc will add significant pressure to the already congested London road and New Inn Lane. The increase in solution and noise is unacceptable.

The phasing of the proposed Gosden Hill development is in advance of proposed improvements to the A3. This makes no sense.

The major transport issues around Guildford need to be resolved before any further development is considered, these include the proposed A3 tunnel, new river crossing, a workable central bus terminal and a rail station at Merrow.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Green Belt:

The National policy is clear in that it attaches great importance to the nature of the Green Belt.

The Plan does not show evidence of exceptional circumstances to justify why the Green Belt land should be used for strategic development.

Brownfield land needs more consideration, surely the decline in the need for retail space means that houses could be built in the town centre instead of more retail units, student accommodation should be constructed on campus even if higher rise accommodation is used.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
10. The recent result of the EU referendum means it’s highly likely that net migration into the country will fall. This will reduce the demand for housing in the area and create an oversupply which could see house prices crash.

11. There are 8 Grade 2 listed buildings in the site area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1850  Respondent: 14965985 / Shehryar Shafiq  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Having read the revised plan for 2017 I note that you have removed site A46 - 1,100 homes and school and also removed Site A47 - 50 homes. Please note that I support the decision to remove these sites for all the same reasons that I objected to the sites when they were in the 2016 Local Plan.

I also note that you would like to remove from the Green Belt the homes in Guildford Road, northern end of Glaziers Lane, Flexford, Walden Cottages and Palm House Nurseries traveller site. I would like to strongly object to this proposal. The green belt should not be changed at all, the local area could not cope with further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/4  Respondent: 15057889 / Katherine Pyne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object. I do not agree that the plan is up to date and relevant

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/6  Respondent: 15057889 / Katherine Pyne  Agent:
<table>
<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): (No)</td>
</tr>
<tr>
<td>I Object. I do no agree with the underhand move to publish this plan with such short notice.</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

| Comment ID: SQLP16/10 | Respondent: 15057889 / Katherine Pyne | Agent: |
|---|
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): (No) |
| I object. The plan is not justified based on proportional evidence |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

| Comment ID: SQLP16/12 | Respondent: 15057889 / Katherine Pyne | Agent: |
|---|
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): (No) |
| I object. I do not agree that the local planning authority has engaged constructively with the local residents over this plan. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

| Comment ID: SQLP16/14 | Respondent: 15057889 / Katherine Pyne | Agent: |
I am disabled and would find it difficult to attend the examination.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/15  Respondent: 15057889 / Katherine Pyne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I object to the overall plan which i feel needs to be reconsidered with the views of the local residents taken into consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2037  Respondent: 15060321 / Wey Estates (george hamburger)  Agent: Grant Consultancy (Alastair Grant)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. These representations concern land at Send Business Centre, Tannery House, Tannery Lane, Send identified under draft Policy E1 as a “Locally Significant Employment Site”. In broad terms the owner of Send Business Centre (Wey Estates Ltd) supports the allocation of their site under Policy E1. However, objections are raised for 4 separate reasons:

   ◦ Wey Estates Ltd object to the fact that significant parts of the curtilage of the site has been, for some reason, excluded from the allocation (Representations under ‘A’ below).
In view of the importance of the site in strategic terms it should be identified as a Strategic site not a Locally Significant Employment Site (B).

Objections are also raised in relation to the wording of Policy E1 (C)

There is a separate objection to the wording of Policy E2 which is inconsistent with the aims of Policy E1 (D).

In the representations that follow we deal with the main aspect namely the extent of the land to be identified under Policy E1 and then deal with the status of the site within the policy and then the specific wording of the policy.

Policy E1 Sustainable Employment

A. EXTENT OF LAND AT TANNERY LANE, SEND IDENTIFIED UNDER POLICY E1

2. The Proposals Map to the Submission Local Plan appears to delineate only the footprint of the main building complex at Send Business Centre and excludes important other areas which also form part of and are intrinsically linked to the industrial complex. This is at odds with the extent of land which has always been historically associated with the curtilage of the former industrial and present business use of the site. It is also at odds with the way the extent of the vast majority of the curtilage of other allocated sites have been identified under Policy E1. It is also inconsistent with the objectives of the policy itself where the retention and regeneration of these sites is encouraged and intensification where possible will be considered to be appropriate.

3. Set out below we explain why Wey Estates Ltd seek to amend the Submission Local Plan by adjusting the boundary of the “Locally Significant Employment Site” on the Proposals Map to reflect the extent of the industrial curtilage as shown on drg no. 12.067.SITE, (Document 1) an extract of which is set out below. (We deal with the important case for identifying the site as ‘Strategic’ later in these submissions).

4. In this regard it is also relevant to take account of the definition of previously developed land found in the glossary to NPPF. In defining the meaning of ‘Previously Developed Land’, Annexe 2 defines this as:

“Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure”.

For the reasons that will become obvious when considering the close association of the subject land, its appearance, previous long standing and established use in connection to the adjoining factory complex there can be no doubt that the subject land should be recognised as falling within the curtilage of Send Business Centre and that it is vitally important that this curtilage is recognised as such through the Local Plan process to ensure the future prosperity and viability of the Send Business Centre.

Wey Estates Ltd seek to have the boundary of Send Business Centre amended to reflect the red line above

Historical Association of the land from forming part of the curtilage of Send Business Centre.

1. Attached to these representations are the following documents:
• Letter from Hamburger, Director and Shareholder of Wey Estates Ltd setting out the historical association of the land and its industrial curtilage (Document 2)
• Copy of documentation submitted as part of a planning application some 21 years ago in relation to the industrial curtilage (Document 3)
• Representations made some 15 years ago in connection with the first Borough Local Plan also referencing the industrial curtilage of the sit (Document 4)

1. In his Statement dated 6th July 2016 (Document 2), Mr Hamburger sets out the chronology of the use of the site. It is clear from this letter that both the large hard surfaced car park and storage area opposite the main factory complex and the open storage area to the south-west and rear of Cheriton have formed part of the curtilage of the industrial complex for over 55 years (since 1961) and have been continuously used as such for that period of time. The same is true also of the ‘island’ site referred to in Mr Hamburger’s letter although Wey Estates Ltd do not seek to develop this part of the curtilage other than as open land associated with the Business Centre.

2. Hamburger’s statement is corroborated in a number of documents associated with the use of the site. An example (Document 3) is a planning application submitted some 20 or so years ago for the re-use of the factory premises where the ‘red line’ of the application embraced all the land the subject of these representations with the then Chartered Surveyors acting for the owners in their Planning Policy Assessment stated that:

“The site relates to three parcels of land comprising approximately 3.75ha (9 acres) straddling both the River Wey Navigation and Tannery Lane, Send. All three parcels form the curtilage of the industrial complex” (see para 2.01)

1. The site plan attached to the planning application clearly identifies those parcels of land referred to as being part of the curtilage of the industrial complex and is the same as those parcels the subject of these representation

2. Similarly, the owners made representations to the council regarding the status of the industrial site during the formal objection period to the Deposit Draft Local Plan in February 1999 (which eventually emerged as the adopted Borough Local Plan in 2003). In seeking to identify the site as a ‘Major Developed Site in the Green Belt’ the representations referred to the fact that it comprises a major developed factory site that pre-dates both the Green Belt description and the town and country planning system. There is also reference that during discussions with the council there had been agreement that redevelopment would be appropriate provided the advice given in Annex C of PPG2 is taken into account. The plan attached to those representations similarly identify all the land the subject of these representations. (Document 4).

3. All these factors, particularly the first hand detailed knowledge of the site of Mr Hamburger, all point to the fact that the industrial curtilage of the site embraced all parcels of land the subject of these representation

Analysis of the extent of the curtilage of other allocated sites have been identified under Policy E1.

1. The following other sites are identified under Policy E1, either as ‘Strategic Employment Sites’ or, as in the case of Send Business Centre, ‘Locally Significant Employment Sites’:

• 57 and Liongate Ladymead
• Cathedral Hill Industrial Estate
• Guildford Business Park
• Guildford Industrial Estate, Deacon Field
• Henley Business Park, Normandy
• London Square, Cross Lane
• Merrow Lane (incl Perram Works, Bridge Park, Merrow Business Centre, SCC depot)
• Midleton Road Industrial Estate
• North and south of Lysons Avenue, Ash Vale
• Quadrum Park, Peasmarsh
• Riverway, Astolat, Weyvern at Peasmarsh
• Slyfield Industrial Estate
• Surrey Research Park (extended)
• The Guildway, Portsmouth Road
• The Pirbright Institut
• Woodbridge Meadows
• Woodbridge Park, Woodbridge Road
1. By reference to the Proposals Maps, (despite that some are very small scale), it would appear that, bar one exception, all of the above sites are identified by reference to their curtilage rather than the ‘footprint’ of the building. (Three examples are shown below). There is no explanation given as to why Send Business Centre is being treated differently, perhaps it is simply an oversight of the draughtsman. Nevertheless, we believe that this anomaly should be corrected and Send Business Centre be identified by reference to its curtilage as well so that there is consistency in the policy and to enable the objectives of Policy E1 be met in this case.

[IMAGE 2]

Henley Park (above) and Riverway, Astolat, Weyvern at Peasmarsh (below) two examples of all the other Strategic Employment sites in the Green Belt which are all identified by their curtilage

[IMAGE 3]

Grange Court (below), an example of all the other Locally Significant Employment Sites, delineated by their curtilage

[IMAGE 4]

In contrast Send Business Centre (below) is identified almost exclusively by the building’s footprint ignoring its curtilage

[IMAGE 5]

13. A clue perhaps as to why the Submission Plan has erroneously treated Send Business Centre differently is found in the Topic Paper accompanying the Submission Local Plan. Para 4.51, dealing with the Tannery Lane site says this:

“An undeveloped 1.4ha site in the Green Belt, was identified in the Draft Local Plan to meet the identified employment need. It was proposed Send Business Centre would be expanded on to this site.”

14. Clearly the author of this document is under the mistaken impression that the land in question is “undeveloped” whereas the reality is it has always played an important open storage and hardstanding area role as part of the curtilage associated with the business complex. Indeed, there are already two industrial buildings on it (see photos in Mr. Hamburger’s statement) as well as the rebuilt wharf. The comment that “Send Business Centre would be expanded on to this site” is also misleading since the lawful position is that the land is already intrinsically part of the established industrial curtilage and has been so for over 50 years. Moreover, in accordance with the definition found in NPPF (see para 4 above) the land can lawfully be described as ‘previously developed land’. There is therefore no ‘expansion’ into this area: it has always been associated with and used for industrial/business purposes in much the same way as the curtilage of the other identified business sites identified under Policy E1, some of which are illustrated in the site plans above.

15. It is also important to point out that the in relation to land much further to the west that was identified as a Potential Development Area (PDA), representations made at the time in respect of Send Business Centre were on the basis that the business complex and its curtilage should always be recognised as such in the emerging Submission Local Plan: whether or not the adjoining PDA land was to be agreed.

1. It is for that reason that the conclusions in the Topic Paper that:

“This PDA is located within high sensitivity Green Belt and is therefore no longer considered appropriate. As a result, this site (ie SBC) is also no longer considered appropriate”

is based upon a misunderstanding of the site, its curtilage, and its function.
1. The curtilage of Send Business Centre is surrounded on its southern and western sides by extensive landfill sites that were previously excavated quar. Moreover, the council granted planning permission just 9 months ago for new development including two storey workshops and chandlery buildings amounting to over 7,000 sqft (approx. 620sqm) together with a hard surfaced car park for 57 cars on land immediately adjoining the western boundary of the curtilage (ref:14/P/002289, dated 9/9/2015). By no reasonable test therefore could either the curtilage or the immediately surrounding area be accurately described as “high sensitivity Green Belt”.

1. In this regard, it is interesting to note that in considering the recent planning application for the refurbishment of the wharf at Send Business Centre (Ref:15/P/0249) - which is located within the curtilage land - in answer to the following question on the planning application forms “Please describe the current use of the site” the answer given was “Part of the curtilage of Send Business Centre”. Following a subsequent site visit by the officers, the Head of Development Control in recommending approval of the planning application was able to advise the Planning Committee in his Report recommending approval that “There is no material change of use of the land for this application site”.

1. On this basis it would appear that as recently as last year the Planning Officer was of the opinion that the land forms part of the curtilage of Send Business Centre as no material change in use was propo

The Objectives of Policy E1 and Send Business Centre

1. There is an acknowledged lack of suitable and diverse employment sites that we believe discourages investment from new companies in the borough and encourages existing firms to relocate to other parts of the UK or overs. Moreover, the lack of supply is hampering the aspirations of ‘start-up’ businesses. Accordingly, the Local Plan and Policy E1 through its allocations should address the need for a wide range of business and employment opportunities for current and future businesses.

1. The Employment Land Assessment (2013) concluded that the Borough’s employment needs cannot be met within existing sites and established employment ar. It concluded that provision should be made for a net additional increase in B use class floor space of between 10.5 ha (105,000 sq m) and 20 ha (200,000 sq m) to meet the Borough’s identified employment needs. Moreover, it advised that there is not enough supply of employment land to meet future growth needs and the potential capacity does not meet the lower and upper baseline requirements.

1. The Assessment also acknowledged that there is a need to provide a degree of choice and flexibility when planning for future employment needs, to ensure that the local property market can operate efficiently! The implications are that “If we do not provide enough suitable land and enough choice and flexibility, the new Local Plan may not meet the needs of the borough’s businesses. In time, this could lead to existing businesses moving out of the borough and new and small businesses, not being able to establish themselves or invest in the borough”.

1. This background work was updated by later research undertaken by Aecom and instead of expressing the need in Ha, a floor area based figure was given with a range of between 37,200sm – 47,200sqm B1 (a) and (b) sp. In the light of this the council decided to reduce their forecast for the need for B space to be provided within the Borough. We believe that this is a wrong approach and that a more flexible approach adopted bearing in mind of the vagaries of the market, the need to provide a range of B space both in terms of size and location and the fact that this later research could not anticipate the making permanent the GPDO rights to change B1 space to residential. In the period 2013-2016, this amounted to the loss of the sizeable amount of some 12,772sqm of B1(a) space to residential. Clearly this trend will continue as more B1(a) sites come forward as leases end and opportunities for residential conversions increase thus putting pressure to provide more suitable B1 floorspace. The range of proposed floor areas given in the policy should therefore be revised upwards (a consequential change to the floorspace figures given in Policy S2 would also need to be revised).

1. Accordingly it is right to look at potential land, including those sites in the countryside to provide for sustainable development locations and provide enough employment land to meet the expected employment needs of existing and new resid. This is particularly the case where a number of established employment sites in the countryside can provide for expansion without harming countryside interests. In this regard, the earlier published ‘Issues and
Options’ paper acknowledged that rural wards accounted for almost half of the new jobs created in Guildford Borough between 2002 and 2008 according to the Guildford Economic Strategy 2011 - 2031.

1. In the short term, the need for employment land may be met through the intensification and redevelopment of existing sites and the protection of employment use on key strategic sites. This relates to both urban sites and established employment sites in the countryside. However, it is acknowledged by the research undertaken by the council that this is unlikely to be sufficient in the medium to long-term and does not allow for any choice for potential occupiers or flexibility within the market. The Plan should therefore provide choice for businesses to start up as well as supporting existing businesses to expand. It comes as no surprise to learn that para 3.35 of the previously published Local Plan Strategy and Sites Issues and Options paper advised “For all of these reasons the Local Plan needs to continue to support job creation and business in rural areas.”

1. Send Business Centre presently provides for the employment needs for a number of start-up and innovative businesses as well as more established companies. It is focussing on the digital sector with a view to creating a hub to meet the demand from the unique local supply chain of companies involved in activities such as studios, video, sound & post production, apps, etc. Moreover, LEP funding in place to improve fibre infrastructure and promote innovation support at the site.

1. An important part of Send Business Centre is Tannery Studios (TS). TS is collaborating with both Enterprise M3 LEP, and Surrey Research Park based start-up incubator ‘Set Squared’ to develop TS’ facilities into a globally significant hub specialising in digital media / creative companies. Successful companies at TS will interact with locally based companies such as EA Games, thereby benefiting Guildford Borough as a whole. However, site capacity within the existing buildings will be reached shortly and there is concern that the emerging Local Plan does not reflect the LEP priority of employment in a sector that Guildford is especially strong in given ACM and ‘Tonmeister’s’ stream of talented graduates.

1. TS already has numerous innovative and expanding companies such as Lifelines Limited, a recipient of the Queens Award for Commerce; My Little Eye Productions, a music video production house; Slik Pictures, a creative start-up that recently re-located from Silicon Roundabout; Tactic Games, the sales agent of the Angry Birds game; Ben Preston, the producer for Rihanna and the Harry Potter films and Roomba, the global leader in automated vacuum technologies.

1. It is for that reason the Send Business Centre is concerned about the adverse economic consequences of the decision to remove parts of its curtilage as a Locally Significant Employment Site or as a Strategic site which the company believes it should be allocated. It is impracticable to suggest that as TS can operate without parking and room for controlled expansion, and is contrary to the LEP’s funding initiative to stimulate employment and will act as a block on growth as TS will have no move on accommodation.

1. The additional land within the curtilage of the Business Centre is suitable for a sensitive expansion in accordance with the requirements of Policy E1 which could create additional business space for these and similar likeminded businesses. The land is available now to meet the employment needs of the Borough and its development can proceed without significantly harming countryside or other interests. As referred to in the statement of Mr Hamburger, planning permission is already in place to carry out road improvements to Tannery Lane in the vicinity of the site.

1. This approach is fully supported in the NP. As para 28 advises:

Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy, local and neighbourhood plans should:

- support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well-designed new buildings; (para 28)

Accordingly the Proposals Map should be amended to reflect the established industrial/business curtilage that has been established for more than 50 years so as to allow a planned and sensitive expansion of the site in accordance with the objectives of Policy E1 and at the same time safeguard the existing parking and essential storage facilities on site.
B ALLOCATION OF SEND BUSINESS CENTRE AS A STRATEGIC SITE

1. The Enterprise M3 Local Enterprise Partnership (LEP) acknowledges that Guildford is rated as one of the UK’s top performing non-metropolitan boroughs and is the primary employment centre in Surrey with a GVA of £3bn in 2011. It is a net contributor to the Treasury of around £2bn. Economic growth has come primarily from high value high R&D sectors including ICT, healthcare and bioscience, satellite technology and computer games including high profile businesses Electronic Arts and Media Molecule.

1. We have referred to above that Send Business Centre is focussing on the digital sector with a view to creating a hub to meet the demand from the unique local supply chain of companies involved in activities such as studios, video, sound & post production. Its strategic importance in this field is acknowledged by the Enterprise M3 Local Enterprise Partnership where Government funding through the LEP is in place to improve, develop and expand the business opportunities at Send Business Cent

1. Para 4.6 of the Submission Local Plan (under the heading ‘Definitions’) defines Strategically Important Sites as follows:

“The Strategic Employment Sites were identified in the Employment Land Needs Assessment (ELNA). The sites are all larger than 1.7ha and all have more than 7,000 sq m of employment floorspace, most have more than 10,000 sq m of floorspace. Together the sites make up more than 170ha of employment land and more than 580,000 sq m of employment floorspace”.

Send Business Centre extends to some 3.2ha, and comprises over 8000 sqm of B1 and R&D employment floorspace. In addition, para 4.4.3 advises that each of the Strategic Sites account for over 100 jobs. By comparison, Send Business Centre presently employs 195 people. It is therefore well above the minimum parameters for being designated as a Strategically Important Site. Moreover, it is the home of a number of innovative and expanding companies who provide employment and contribute significantly to the local and national economies.

1. Para 4.3 of the Submission Plan also states that the Council will support existing innovation networks such as the high technology clusters that are such a key part of our economy as well as supporting the wide range of other businesses in the borough. As referred to above in paras 27 & 28, Send Business Centre is one such location. Para 4.4.3 of the Submission Plan then continues:

The Corporate Plan supports the Council in playing an active role in Enterprise M3 Local Enterprise Partnership (LEP), supporting its wider objectives to ensure that our economy remains innovative, well-balanced and socially, environmentally and commercially sustainable.

1. Send Business Centre is a major recipient of The Enterprise M3 Local Enterprise Partnership (LEP) support and Government funding through the LEP. In 2013, the Enterprise M3 LEP Board decided to proceed with two projects as being recipients of a total of £8M funding. Tannery Studios which is an integral part of Send Business Centre was one of the two recipients. The allocated £1.3 million will be used to create a new purpose built 1,900 sq. m Innovation Centre at SBC that will deliver a range of bespoke facilities specifically designed to support the needs of high growth creative companies. The facilities will include three video studios, seven sound studios, one live room, 12 editing suites, 25 innovation units and five offices. Commenting on this project Geoff French, Chair of the Enterprise M3 Board, said:

“I am very pleased to announce that the Enterprise M3 Board has approved a further two projects to receive funding from our Growing Enterprise Fund. These projects are very exciting examples of what both the private and public sector are doing in the Enterprise M3 area to stimulate long-term economic growth.

In our Strategy for Growth, the LEP has identified four key priority areas – enterprise, skills, innovation and infrastructure – that we will be addressing to deliver economic growth in the Enterprise M3 area. Both of these two successful bids that we are announcing today is focused on at least one of these areas and therefore is a very worthy recipient of Growing Enterprise Fund funding.”

1. This all points to the strategic importance of Send Business Centre and reinforces the need for it to be recognised as such. ‘Strategic’ means “Relating to the identification of long-term or overall aims and interests and the
means of achieving them”. In this regard the objectives of the Submission Local Plan can in part be met by allocating Send Business Centre as a Strategic Site. Not only does it provide significant floor space and jobs well in excess of the definition found at para 4.4.6 of the Plan but perhaps it is how that space has been and will be continued to be used that justifies its inclusion as a Strategic site. For these reasons we believe that Send Business Centre should be allocated as Strategic site under Policy E1.

C  THE WORDING OF POLICY E1

1. Wey Estates Ltd generally support the wording of Policy E1, but see no real reason why the Strategic Employment Areas are treated differently from Locally Significant Employment Areas in terms of the support given by the policy.

1. Strategic sites are dealt with in this way:

“The seventeen designated sites that together make up the borough’s current core supply of employment land will be protected as Strategic Employment Sites and changes of use from employment to non-employment uses resisted. The retention, intensification and employment based regeneration of these sites is encouraged”

whereas Locally Significant Employment Sites are dealt with in the following manner:

“The Locally Significant Employment Sites will be protected and within these sites changes of use to non-employment uses resisted. The retention and regeneration of these sites is encouraged and intensification where possible will be considered to be appropriate”.

1. We do not believe there should be any difference between the wording; both strategic and local sites are identified as worthy of protection because of their importance to the Borough’s economy. It follows therefore that the retention, intensification and employment based regeneration of both Strategic and Local sites is encouraged. Strategic and Local sites are located in both urban and countryside locations and therefore the policy context of those locations would also have a bearing and be taken into account in considering any subsequent planning applications.

1. Accordingly, we believe that the wording for Locally Significant Employment Sites should be changed by deleting the following text:

“The Locally Significant Employment Sites will be protected and within these sites changes of use to non-employment uses resisted. The retention and regeneration of these sites is encouraged and intensification where possible will be considered to be appropriate”.

and inserting the following text:

“The Locally Significant Employment Sites will be protected and within these sites changes of use to non-employment uses resisted. The retention, intensification and employment based regeneration of these sites is encouraged”.

1. Alternatively, the policy could be recast so that the above insertion applies to both Strategic and Local site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- IMAGE 1.jpg (46 KB)
- IMAGE 2.jpg (85 KB)
- IMAGE 3.jpg (82 KB)
- IMAGE 4.jpg (20 KB)
- IMAGE 5.jpg (18 KB)
D OBJECTION TO POLICY E2: LOCATION OF NEW EMPLOYMENT FLOORSPACE

43. The objectives of Policy E2 are inconsistent with the objectives of Policy E In relation to Locally Significant Employment Sites, Policy E1 (as drafted, not what is proposed above) says:

“The Locally Significant Employment Sites will be protected and within these sites changes of use to non-employment uses resisted. The retention and regeneration of these sites is encouraged and intensification where possible will be considered to be appropriate”.

There is therefore a clear indication in Policy E1 that regeneration is encouraged and intensification - where possible - considered to be appropriate.

44. This contrasts with the phraseology of Policy E2 which directs intensification and expansion to strategic sites and where only 200sqm of additional floorspace (an entirely arbitrary and unexplained figure) would constrain the expansion/intensification of Locally Significant Employment Sites Moreover, the policy goes on to say:

“The expansion of existing offices in locations outside town centres and Strategic Employment Sites should be limited and any development not limited in scale is to be directed to sequentially preferable locations”.

45. These sentiments clearly do not align with the Policy support given in Policy E2 is then contradicted with its reasoned justification as expressed at para 4.4.23:

“To ensure the supply of premises is suitable for modern business needs, renewal including redevelopment of existing offices is encouraged.”

46. An informed reader is therefore left with contradictory policy statements as to how a specific site should be consider In particular, the arbitrary limit of increases in floor area of 200 sqm should be deleted. That figure may be appropriate for a small employment site but is a totally unrealistic figure when assessing the needs of a site such as Send Business Centre with over 8000 sqm existing floorspace. Accordingly, Policy E2 should be re-casted to take account of the anomalies identified above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Further to the local plan submission I would fully support the Church Street, Effingham site, even though it is in greenbelt, it would seem a very sensible infill site. Regarding the other allotted sites I notice Lyons Field, Effingham Common Road has been missed off. Surely this is a site which would again give good infill and ease the burden of housing?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3  Respondent: 15061505 / Mark Jennings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Taking this into account with Cil projected @ £500 per meter how are you going to get any housing built!!! Every other borough is £125. I would recommend you review this or you will never get any houses built.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4547  Respondent: 15061697 / Joanna Steen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Effingham

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I note with interest regarding Effingham's local plan. I would fully support the Church Street, Effingham site, it seems a good infill site. The glaring omission would be Lyons Field, Effingham Common Road, to me presents an ideal opportunity to ease the housing problem within Effingham.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: SQLP16/60  Respondent: 15062017 / Neil Aust  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

The "evidence" is largely documents commissioned by the council to support the required outcome. For example, the green belt study nicely explains why each of the chosen areas could be built on, but does not address the impact of such development on the local wildlife or residents. Much of the so-called evidence is subjective and/or out of date and/or poorly constructed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/61  Respondent: 15062017 / Neil Aust  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

It seems that “sustainable” is inserted into any sentence involving development with no sustainable credentials whatsoever to make it more palatable.

What is sustainable about building over green-belt sites?

Is the development going to be fully eco-frienly an self-sufficient in power and water? (rhetorical question because of course it's not).

Is development going to be 100% built using renewable or recycled materials sourced from responsible suppliers? (another rhetorical question because of course it's not).

Is the energy input into the materials and development techniques being monitored and developers being held to account? (again, a rhetorical question because of course it's not).

What’s happening about the transport, water, power and telecoms infrastructure to support each development? Is the developer paying for all of this or are we having to fund the expansion of Guildford through our council tax?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I don't believe the housing numbers stated in the Strategic Housing Market Assessment 2015 (SHMA) to be accurate. It seems to use foreign students to increase the number of people needing housing and by my calculations, if we have a population increase of 20,000 in the time given in the plan, then the number of homes needed is more around the 8,000 area than the 13,860 the GBC have said. This surely states that a large number of buyers will come from else where and not from this area. While I understand some housing is needed, the number proposed is ridiculous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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4) No Provided evidence for the need of industrial buildings.

As far as I can see, the Guildford Borough Council have not provided the evidence needed to prove that there is a need for employment space as the Employment Land Needs specifies under the Employment Land Needs Assessment 2015 (ELNA) which shows an 80% reduction in employment space from the previous ELNA carried out by the GBC in 2013. The space in burnt common area is therefor no longer needed!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
No provided evidence for the need of industrial buildings.

As far as I can see, the Guildford Borough Council have not provided the evidence needed to prove that there is a need for employment space as the Employment Land Needs specifies under the Employment Land Needs Assessment 2015 (ELNA) which shows an 80% reduction in employment space from the previous ELNA carried out by the GBC in 2013. The space in burnt common area is therefore no longer needed!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7  Respondent: 15062081 / Chris Heath  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This site was not given the consultation required.

It was added in an underhand manor and slipped in at the last minute to 'hide it' from local people and there right to comment. The borough councillor's from the Guildford Green Belt Group and Lovelace where treated in a terrible manor due to their rightful objections at the meeting held a week ago and I feel an apology should be given at the least. A full consultation under regulation 18 should be applied as it was only put in last minute, not the cheeky undemocratic regulation 19.

I will also send this to the local planning consultation/ GBC millmead and I shall be completing the questionnaire on the website.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8850  Respondent: 15062081 / Chris Heath  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
There is no more housing needed for this part of Garden City Borough Council (GBC) has gone back on their word that they have listened to the people and have decided to take out much of the housing proposed for the Send area in the first version of the local plan. Yet they have now put in an even bigger number of houses that they labelled 'affordable'. These are not affordable to the young members of this community regardless of what the very cleverly questioned statistics provided. I have talked to many of the young first time buyers in this area and not many of them can afford to buy in the village they grew up in. Many are forced to move to the midlands or further afield due to this house price increase. The GBC is

obviously aiming for the London buyers and as Woking is the commuter area and a logical area to attract London buyers they have decided to place Send and the surrounding area into a forced plan which will drive out the local residence and drive up the housing market.

I don't believe the housing numbers stated in the Strategic Housing Market Assessment 2015 (SHMA) to be accurate. It seems to use foreign students to increase the number of people needing housing and by my calculations, if we have a population increase of 20,000 in the time given in the plan, then the number of homes needed is more around the 8,000 area than the 13,860 the GBC have said.

This surly states that a large number of buyers will come from else where and not from this area. While I understand some housing is needed, the number proposed is ridiculous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I'd like to have it on record that I, Christopher James Heath, a resident of Send Village in Surrey, strongly object to the proposed plan in the revised local plan from guildford Borough Council of 400 homes and a factory of 7000 sq m for industrial purpose.

My reasons.

1) Infrastructure

I have spoken to Matt Furness about whether or not there are any plans in place to increase the existing infrastructure of affected areas and have been told that there is not. When I say infrastructure I mean everything from transport (both the roads and the public options like busses and trains) to the already collapsing Victorian sewers, to the medical facilities and schools. The phone net works, broadband, mobile masts, electoral supplies, road widening, shops, pubs etc..

It seems that thousands of buildings across this borough are going to be 'thrown up' with out any consideration for infrastructure. Surely this needs to be addressed before any plans can even start to be consulted on? I would have thought that the first logical step?!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
3) The removal of the green belt.

The green belt is a lawful boundary set in place to protect the identities of rural villages and towns. To stop these places merging into one urban area, and for the welfare of the people and wildlife of Britain. This is an historic beautiful country and will be terribly damaged by the removal of its green belts. Below is a statement relating to this.

'Green belt policy in the UK has shown to be highly effective in halting the urban sprawl and improving the quality of life for both rural and urban population. However, the CPRE warns on the so-called developmental threats to green belt policy and emphasizes the importance of protecting the existing green belt areas in their boundaries'.

'The UK government said that it has no intention of changing the boundaries of green belts but the CPRE says that developmental plans and talks about replacing the “lost” green belt areas elsewhere are clearly revealing that the current green belt policy is under threat.

We live in a democratic country. Yet this Government has not listened to the wishes of its people regarding this issue and now we are told that the lawful green belt can simply be removed? This is a legal binding boundary that no developer can question, yet the council can? This should be totally illegal! Our MP for Surrey Sir Paul Beresford stated before his election last year that he wanted the green belt protected. Yet here we are, one year later taking all the villages out of the green belt?!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The UK government said that it has no intention of changing the boundaries of green belts but the CPRE says that developmental plans and talks about replacing the "lost" green belt areas elsewhere are clearly revealing that the current green belt policy is under threat.

We live in a democratic country. Yet this Government has not listened to the wishes of its people regarding this issue and now we are told that the lawful green belt can simply be removed? This is a legal binding boundary that no developer can question, yet the council can? This should be totally illegal! Our MP for Surrey Sir Paul Beresford stated before his election last year that he wanted the green belt protected. Yet here we are, one year later taking all the villages out of the green belt?!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8852  Respondent: 15062081 / Chris Heath  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This site was not given the consultation required.

It was added in an underhand manor and slipped in at the last minute to 'hide it' from local people and there right to comment. The borough councillor's from the Guildford Green Belt Group and Lovelace where treated in a terrible manor due to their rightful objections at the meeting held a week ago and I feel an apology should be given at the least. A full consultation under regulation 18 should be applied as it was only put in last minute, not the cheeky undemocratic regulation 19.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/21  Respondent: 15062113 / Christine Acock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
With reference to the new proposals for two Traveller's sites in Send Hill, I would like to raise the following objections:

1. Having lived alongside Travellers in Berkshire, I witnessed their lifestyle and culture first hand and therefore believe that Traveller’s lifestyle is particularly culturally diverse to that of existing Send Hill residents. When considering culture, ethnicity and diversity, it is important to not only consider the rights of minority groups such as Travellers, but also the rights of existing residents, in regard to their chosen way of life and culture.

1. The road already has very poor infrastructure and is single file traffic alongside the proposed site. The only way the Local Authority could resolve this issue, would be to widen the road and lose the charm that this area of the road affords. I have also noticed that drivers regularly travel too fast in the road and it is only when cars approach from the opposite direction, that traffic is caused to naturally slow as the road narrows. This will also be a concern, if too many additional homes are planned for the road. The infrastructure of the single track road is already exacerbated at times during the rush hour.

1. As so much school traffic uses the road, plus many other daily users who enjoy the walks around this area, it is important for any planning decision to take into account the safety and wellbeing of road users in Send Hill and give consideration to the size of vehicles typically used on a Traveller’s Site.

1. Residents of Send Hill are predominantly middle aged and live quiet, peaceful lives in the main. They are entitled to retain their chosen culture.

1. Travellers that settle are no longer travellers technically and therefore should not be automatically be entitled to the special privileges their culture affords

1. Send Hill is currently an area of beauty, where many walkers come to enjoy the pleasant outlook in the area under consideration as a Traveller site. I believe we have a legacy to retain this landscape and the walks around it, so that future generations can also enjoy it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to Send being removed from the Green Belt.

The village Send provides a green buffer between Woking and Guildford. To develop in the Green Belt requires special circumstances. There are none to justify developing the land in and around Send so Guildford Borough Council have come up with another plan, to remove Send from the Green Belt therefore freeing up the area for development. Guildford Borough Council should not be allowed to abuse the Green Belt in this way in order to just suit themselves. The Green Belt was set up to control urban growth from unscrupulous Councils and Developers permanently. If this is not protected then all of the land in and around the village will be vulnerable to development. This would destroy the character of the village of Send. Guildford would merge with Woking through a series of urban estates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to 45 houses at Clockbarn Nursery.

I object to this site because of the inadequate access and traffic volume. In one direction Tannery Lane is very narrow and twisty, being reduced to single lane traffic in many spots with passing places only; in the other the junction onto Send Road is very dangerous and inadequate. Planning permission has already been given for a marina and 64 apartments which will increase the traffic greatly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I object to the proposal to build 400 houses and 7000sqm of industrial space at Garlick’s Arch.

This site was not included in the Regulation 18 Draft Local Plan so has not had full consultation. The manor in which it has been slipped into the Plan is underhand and unfair. The site is subject to flooding and is covered by ancient woodland. The Industrial space is not needed here and any extra space required should be included in the existing industrial site of Slyfield. The projected housing figures I understand to have been exaggerated, so there is no need for this number of houses to be built in and around Send.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Page 1902 of 2855
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The projected housing figures I understand to have been exaggerated, so there is no need for this number of houses to be built in and around Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/3705  **Respondent:** 15062145 / Philippa Hackett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 4-way intersection. I object to the fact that the road infrastructure through Send has not been thought about and the consequences of putting a large interchange on this site would cause gridlock. The amount of traffic this will create through Send is unfeasible as there is only one two way street that goes through the centre of the village. The intersection would have to take traffic from the proposed 2000 new houses in Wisley Airfield, 2000 new houses in Gosden Hill and 1850 new houses at Blackwell Farm. The traffic form Woking heading to and from the A3 and M25 would come through Send. The traffic congestion is one aspect but there are other considerations such as noise pollution, air pollution levels, weight of traffic on country roads and the damage that will be caused not to mention the destruction of the village and the way of life here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/3923  **Respondent:** 15062145 / Philippa Hackett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the fact that the road infrastructure through Send has not been thought about and the consequences of putting a large interchange on this site would cause grid lock. The amount of traffic this will create through Send is unfeasible as there is only one two way street that goes through the centre of the village. The intersection would have Lo Lake traffic from the proposed 2000 new houses in Wisley Airfield, 2000 new houses in Gosden Hill and 1850 new houses at Blackwell Farm. The traffic from Woking heading to and from the A3 and M25 would come through and the traffic congestion is one aspect but there are other considerations such as noise pollution, air pollution level, weight of traffic on country roads and the damage that will be caused not to mention the destruction of the village and the way of life here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3706  Respondent: 15062145 / Philippa Hackett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development of land west of Winds Ridge and Send Hill. This site was not included in the Regulation 18 Draft Local Plan so has not had full consultation. The site to my knowledge contains documented unsafe landfill waste which was registered with Guildford Borough Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3924  Respondent: 15062145 / Philippa Hackett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This site was not included in the Regulation 18 Draft Local Plan so has not had full consultation. The site to my knowledge contains documented unsafe landfill waste which was registered with Guildford Borough Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to register my objections to the New Local Plan. The Plan does not seem to have a clear design for the whole area. If it does it certainly is not making it clear. Firstly the Transport Plan has been produced very late in the day (only released on the day of publication) and without this infrastructure, none of the developments should take place. It seems that Guildford Borough Council is planning a series of large developments along the A3 corridor but has not thoroughly looked at the impact of this for the surrounding villages. The villages on both sides of the A3 have very inadequate roads to cope with the anticipated amount of traffic and the roads available cannot be improved to the point that will ease the expected congestion. There are many other worries as well, such as environmental concerns, noise pollution, air pollution, flood risks, the sheer quantity of housing and industrial units supposedly required, the list goes on.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I object to Send being removed from the Green Belt. The village Send provides a green buffer between Woking and Guildford. To develop in the Green Belt requires ‘special circumstances’ there are none to justify developing the land in and around Send so Guildford Borough Council have come up with another plan, to remove Send from the Green Belt therefore freeing up the area for development. Guildford Borough Council should not be allowed to abuse the Green Belt in this way in order to just suit themselves. The Green Belt was set up to control urban growth from unscrupulous Council’s and Developers permanently. If this is not protected then all of the land in and around the village will be vulnerable to development. This would destroy the character of the village of Send. Guildford would merge with Woking through a series of urban estates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1171  Respondent: 15062145 / Philippa Hackett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Council not following due process. Since the last Draft Local Plan every site in the village of Send has been changed. Not only locations but also in housing numbers. Even as recently as 5th April 2016 there was a document released giving information on the New Local Plan with links to maps and now there are massive changes, even since the publication of this document. My understanding is that following the rejection of the Draft Local Plan the Council could only push forward under Regulation 19 if there were not significant changes. In Send, None of the 485 new homes was included, the site at Garlick’s Arch was not included, the land west of Winds Ridge and Send Hill was not included and the removal of Send from the Green Belt was not included. These are major changes to the plan for the village of Send. If this amount of change is to be proposed then we need to go back and have a full consultation under Regulation 18.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1191  Respondent: 15062145 / Philippa Hackett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2480  Respondent: 15062145 / Philippa Hackett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the changes in Policy A42, Clockbarn Nursery, Tannery Lane, Send because the proposal is now for 60 homes instead of 45. Tannery Lane is not built to cope with a lot of traffic. At one end it is barely more than a one lane track with occasional passing places that floods, and at the other, the junction onto the A247 is not adequate to deal with any volume of traffic. It is a dangerous junction that gets very congested at busy times as it is. The road has surface flooding issues, more than would be indicated from the Councils records, which local photographs show. It is also eating into the Green Belt and will affect the countryside views from the Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2481  Respondent: 15062145 / Philippa Hackett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the changes in Policy A43, Garlick's Arch, Send Marsh because now in addition to the 400 homes, which now includes self build and custom plots, the proposal also includes 8 travelling/showpeople pitches where there is no proven demand for plots in this location. It is clearly over development of a village and potentially will join up Send Marsh, Burnt Common and Ripley. At the moment these areas are distinctly separate with great space between each area but this large development will change this. Again, it is on Green Belt land which incorporates an ancient woodland, all of which will be destroyed. The land is subject to flooding and the new development will generate a lot more traffic which the existing local roads cannot deal with.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2482  Respondent: 15062145 / Philippa Hackett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to Policy A58 for a minimum of 7,000 sq m of employment floorspace at Burnt Common, London Road. Originally this site was proposed for development in 2014, this was then replaced in 2016 by Garlick's Arch on the other side of the road so if could include a new road junction onto the A3. Now it is proposed that both sites are used. This is clearly overdevelopment in one area. The traffic chaos this will create in and around the whole area has not been thought through as all traffic heading to Woking (and the main train station) will have to go down the single road through Send. Apart from access to the A all other traffic will have to go through the villages of Send, Clandon or Ripley and will impact on Ockham the other side of Ripley. The wording has also changed from maximum to minimum which would suggest that more square footage is probable. I do not understand the need to build an industrial site here when there are still empty sites and units at Slyfield, Guildford. I would suggest that the 2017 Employment Land Need Assessment should by looked at by the Council as there is a massive over allocation of land in Send for this purpose.

I can understand the problems that Guildford Borough Council face with the development of the Borough especially as so much of it is in the Green Belt. However, more creative uses of brown field sites and existing sites should be sought rather than destroying the Green Belt for future generations. If you use only a small percentage now, then in 2034 another small percentage is used and so on, every 15 years, there will no longer be the 'green lungs' for southwest London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1538  Respondent: 15062625 / Stephen Groves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2872  Respondent: 15062625 / Stephen Groves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the building of 45 houses at Clockbarn Nursery because of the inadequate access and increased traffic volume. Tannery Lane is far too narrow and winding, with limited passing places and visibility, to take any further traffic loads. The junction with Send Road is already over-crowded and hazardous both when turning in to Tannery Lane, or exiting on to Send Road. Planning permission has already been granted for 64 apartments at the Tannery and for building the Marina, both of which will already create additional burdens on the tiny lane and its traffic load and further development will only exacerbate this situation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2873  Respondent: 15062625 / Stephen Groves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the building of 7000sq metres of industrial space and 400 houses at Garlick’s Arch opposite Send Marsh Road. The site floods regularly and is covered by ancient woodland, up to 500 years old, which is home to a variety of wildlife. The industrial space is not required and the additional heavy loads of commercial traffic will need to pass through Ripley village in order to gain access to the A3 and M25. There is already provision for commercial space at Slyfield industrial estate and this should be fully developed before additional sites within Green Belt locations are used. With regards to the 400 houses at Garlick’s arch, the currently existing brownfield sites within Guildford and its surrounding areas should be fully utilised before any housing is agreed within Green Field sites. Guildford has refused to share the methodology behind calculating the upcoming housing requirements and therefore no weight should be given to the use of these calculations when planning additional housing capacity.
I further **OBJECT** to the development at Garlick’s Arch for **400 houses** because it was sprung on the village at the last moment with only 2 weeks’ notice and without any prior consultation and is not required in terms of housing need either for the village or the borough.

I further **OBJECT** to the proposed industrial development of **7,000 sq m at Garlick’s Arch** because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/2875  **Respondent:** 15062625 / Stephen Groves  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I **OBJECT** to a new interchange with the A3 at Burnt Common. Send would need to accommodate the traffic for the proposed 2000 new houses at Wisley Airfield, 2000 new houses at Gosden Hill, Burpham as well as the 1850 proposed new houses at Blackwell Farm. Much of the traffic between these sites, the A3 and M25 would need to pass through the already congested roads in Send and Send Marsh, which are already overloaded with existing local traffic. Noise and pollution levels within Send and Send Marsh are already at excessive levels and the proposed interchange would only worsen this situation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/2874  **Respondent:** 15062625 / Stephen Groves  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I **OBJECT** to the development of **40 houses and 2 Travellers’ pitches at Send Hill**. It is an inappropriate location because the narrow width, single access country road provides insufficient access. The subsoil of the proposed site contains documented unsafe landfill waste registered at GBC. Any development of this site would spoil a high amenity area set in beautiful countryside.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
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<tr>
<td>I OBJECT to the fact that infrastructure requirements have not been properly considered at any point in this proposed Local Plan, and are inadequate to deal with proposed increase in housing levels. Roads, public transport, availability at doctor’s surgery and places within schools will be unable to cope with the increase in housing and population.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT to Send Village being removed from the Green Belt. The Green Belt was intended to be permanent, as required by the National Planning Policy Framework, and there are no special circumstances to justify abandoning it. Send’s Green Belt provides an essential buffer stopping Woking and Guildford becoming one large conurbation. Local councillors and central government gave a clear election promise to protect the Green Belt and this plan reneges upon that election promise. Developers will be quick to take advantage of the removal of Send from the Green Belt and then there will be nothing to stop further development.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

I OBJECT to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>SQLP16/1010</th>
<th>Respondent:</th>
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<td>Document:</td>
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</table>

I OBJECT to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>pslp173/23</th>
<th>Respondent:</th>
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<td>Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send</td>
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</table>
OBJECT to the proposal to inset Send Business park from the Green Belt because it will be situated in an area of outstanding beauty within the countryside adjacent to the Wey Navigation and there is highly restricted access to along Tannery Lane in both directions. Children regularly use Tannery Lane as a cycle route away from the main roads in order to get to Send Park, and this will increase the risk to other road users, especially on bicycles. Further development of this area directly ignores the openness of the greenbelt and the value to which it provides within our community.

I request that my comments and objections are shown to the Planning Inspector and also request a confirmation to that you have received this objection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/300  Respondent: 15062625 / Stephen Groves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A42 change at Clockbarn in Tannery Lane because the increase by 33% of homes to be developed, from 45 to 60, is too many for such a small area. It ignores all my previous objections to this proposal and, in fact, has made it worse than before even though I, and many others, objected strongly to this proposal. It worsens traffic issues in Tannery Lane, which is already a small single lane in places, and erodes the green belt. There is increased risk of flooding due to surface run off and it will affect the natural topology and countryside around the area which has already been designated as Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/301  Respondent: 15062625 / Stephen Groves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43 change at Garlick's Arch because the site floods regularly (designated as flood zone 2) and is covered by ancient woodland, up to 500 years old, which is home to a variety of wildlife. The currently existing brownfield sites within Guildford and its surrounding areas should be fully utilised before any housing is agreed within Green Field sites. There is no proven demand for traveller sites in the location and the addition of 400 houses in a small area defies all previous objections to this proposal and is a total over-development of the village. It will essentially create a "super-village" by which Ripley and Send are amalgamated in to one and the increase in volume of traffic within the small roads and lanes
around the villages will not be able to cope. There are no proposals around the increase in additional services, such as schools, doctors, shops or road improvements for the local village.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** pslp172/302  **Respondent:** 15062625 / Stephen Groves  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I OBJECT to Policy A58 at Burnt Common because** it ignores all previous objections made about industrial land in this location and has been added once again to the proposal after being previously removed due to public objection. The plan has changed the requirements from Maximum to Minimum of 700sq m of industrial land and there is no evidence to support this area being desirable, or necessary, for industrial expansion especially when Slyfield and Guildford still have industrial sites which are not fully utilised. The impact of industrial usage like this on small surrounding roads will be highly significant and will, once again, join Send as a Super Village to the surrounding villages whilst having a damaging impact on the surrounding green belt areas.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPA16/775  **Respondent:** 15062657 / Wendy Corrigan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt is meant to be permanently protected, not continually eroded.

**I object** to the proposed developments in Send, Garlick's Arch, Clockbarn Nurseries and Send Hill because there are no special circumstances and the "housing need" figure of 13,860 is excessive - resulting in completely unnecessary development of Green Belt land.

**I object** to the removal of Send from the Green Belt, because the village and its countryside forms a much needed separation between Guildford and Woking.

Furthermore, Guildford's urban brownfield areas are much closer to existing transport provision, and all the development that is really needed can be accommodated in these 'non green belt' areas.
I object to all the proposed development of all sites in Send which were not included in the earlier consultation in 2014. Unlike the rest of the borough, Send has not been properly consulted and the proposals for these sites have been changed substantially.

I object to the proposed new interchange onto the A3 at Burnt Common as it would result in Send Road (A247), which is already extremely busy, being constantly gridlocked. In addition, the Transport Evidence is incomplete and unreliable and indicates that Send would be used as a cut through to the A3/M25 causing unrelieved congestion.

I object to the development at Garlick’s Arch which, as an area of ancient woodland, is a site worthy of special consideration and conservation. It includes trees which existed in the 16th century, and these would necessarily be endangered. The site is also subject to flooding.

I object to the development of 400 houses at Garlick’s Arch, because it was without any prior consultation and is not required in terms of housing need either for the village or the borough.

I object to the proposal for industrial development of 7,000 sq m at Garlick’s Arch. This totally without justification as the latest Employment Land Needs Assessment in 2015 shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for a large area of industrial space it should be made available at Slyfield where there is a 40ha site.

I object to the building of 45 houses at Clockbam because of inadequate access for the resulting volume of cars, lorries etc. Tannery Lane is narrow and winding and totally unsuitable for any increase in traffic. The junction with Send Road is already extremely hazardous for vehicles joining the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. This road cannot take any more - ACCIDENTS WILL HAPPEN.

I object to the development of 40 houses at Send Hill. This Green Belt amenity is within an area of unspoilt countryside which would be irrevocably blighted. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing inadequate and unsuitable access. The subsoil of this area contains documented unsafe landfill waste which is currently vented.

I object to the fact that infrastructure requirements are inadequate to deal with proposed housing levels and have not been properly considered. Roads, doctors surgeries and schools will be unable to cope.

I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt adjacent to the A3. This will ruin the open amenity of the borough, and most importantly, inevitably result in daily gridlock on the A3 and surrounding roads including the A247 - THESE ROADS ARE ALREADY AT FULL CAPACITY.

I object to the large proposed development of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm. This will destroy large areas of Green Belt and agricultural land and again result in even more congestion on the A3 and surrounding roads including Send.

Finally, I object to the failure of Guildford Borough Council to acknowledge that there are sufficient brownfield sites within the urban area These should be used for development in the first instance, before open countryside and the Green Belt are destroyed forever. Also, why it has failed to include the 2015 Town Centre Masterplan within it's proposals.

Please confirm receipt of this letter and ensure that my objections are shown to the Planning Inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: pslp172/3282</th>
<th>Respondent: 15062657 / Wendy Corrigan</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>Where is the proven demand for plots for Travelling Show people in this location?</td>
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<tr>
<td>• Ripley and Send will be joined up - again defeating the purpose of the Green Belt, and it will generate a huge increase of traffic on the already busy local roads.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>• This was rightly deleted from the 2014 draft proposals, because of objections raised. It now appears that the ‘maximum’ size in the 2016 draft has changed to ‘minimum’ size, despite the fact that there is now less demand for industrial development.</td>
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<td>• What is the rationale to building industrial warehousing on Green Belt land when there are empty sites and units in Slyfield and at other Guildford sites?</td>
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<td>• 'The Employment Land Need Assessment 2017’ indicates reduction in demand to 3.9 hectares of industrial land for the WHOLE BOROUGH, yet 10 hectares is proposed for Send in the Green Belt. WHY?</td>
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<td>• The defined local villages will merge - defeating one of the purposes of the Green Belt, and the resulting impact on traffic using the small local roads will be hazardous, and add to pollution.</td>
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</table>
We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/874  Respondent: 15062817 / Keith Liddell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please refer to the attached document for a comprehensive comment.

We object to the inclusion of site A46 as a strategic site for development, it should remain as green belt. The need for a new secondary school at site A46 is not justified by the evidence base in the draft Local Plan. We are supportive of small-scale infill development at a level that does not change the communities of Normandy and Flexford and does not change our way of life or amenity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Comment on strategic site A46.pdf (5.4 MB)

Comment ID: PSLPS16/875  Respondent: 15062817 / Keith Liddell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I, Mrs S. Jane Liddell object to the inclusion of site A46 as a strategic site for development, it should remain as green belt. The need for a new secondary school at site A46 is not justified by the evidence base in the draft Local Plan. We are supportive of small-scale infill development at a level that does not change the communities of Normandy and Flexford and does not change our way of life or amenity.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:** [Comment on strategic site A46.pdf](5.4 MB)

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**Comment ID:** pslp173/158  **Respondent:** 15062817 / Keith Liddell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (Yes), is Legally Compliant? (Yes)

Answer (if comment is on questions 1-7 of the questionnaire): ()

We agree with the proposed changes as they relate to the removal of site allocations A46 and A47 from the 2017 Local Plan.

We would, however, like to see LRN17 road improvement to be brought forward in time and council funded, rather than the proposed developer funded, as that intersection is already a major bottleneck and is a very dangerous intersection.

[Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp173/157  **Respondent:** 15062817 / Keith Liddell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (Yes), is Legally Compliant? (Yes)

Answer (if comment is on questions 1-7 of the questionnaire): ()

We fully agree with and support these proposed changes to the Local Plan being Normandy and Flexford Amendments 1, 2 and 3-8. We thank GBC for listening to our concerns regarding the 2016 version of the proposed Local Plan and reflecting them in these proposed changes.

Keith Liddell, S. Jane Liddell and Natasha Liddell, [response has been redacted due to a statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1602  Respondent: 15062817 / Keith Liddell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (Yes), is Legally Compliant? (Yes)

Answer (if comment is on questions 1-7 of the questionnaire): ()

We fully agree with and support this proposed change to the Local Plan, being the removal of Policy A46 from the Local Plan. Keith Liddell, S. Jane Liddell and Natasha Liddell. Residents of [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998].

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/417  Respondent: 15062817 / Keith Liddell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (Yes), is Legally Compliant? (Yes)

Answer (if comment is on questions 1-7 of the questionnaire): ()

I agree with these proposed changes

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8  Respondent: 15063553 / Keith Harrington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to register my objection to the above plan. Development for housing is inappropriate due to its permanent Green Belt status. The sub soil of the site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is inappropriate due to the narrow width single track country road providing insufficient access to the site.

I therefore object to this proposal. Please ensure my comments are seen by the inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1708  Respondent: 15063745 / John Pryce  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of any clear evidence for the supposed need for the number of additional houses proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2017  Respondent: 15063745 / John Pryce  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Re. Policies A25, A35, A42, A43, A43a, A44.

I wish to place on record my objections to the current GBC Draft Local Plan 2016.

1. I strongly object to the 'insetting' of Send, Ripley and Wisley, thus removing the protection afforded by the Green Belt. What remains of the Green Belt should be sacrosanct, held in trust for future generations.

2. I strongly object to the late inclusion of Garlick's Arch in the Plan. There is no justification for putting 400 houses and 7,000 sq. m. of industrial space on this farmland. The site includes some ancient woods which must be preserved. The associated links to the A3 would cause excessive traffic through Send, with which it could not The A247 is already at a standstill in the morning rush-hour. The Council promised to use 'Brownfield' sites and this is what they should do.

3. The addition of 485 houses in Send, plus 2,000 at Wisley will require considerable new infrastructure, school places and Doctors' Surgeries, for which there is no immediate provision in the Plan. I object to the lack of any real evidence for the need for this amount of new housing in this area.

4. I object to the proposal to build 45 new homes on the Clockbarn Nursery site, since this is on the flood-plain. Tannery Lane is very narrow and the increased traffic would cause major problems.

5. I object to the proposal to build 40 homes and 2 travellers pitches on land west of Winds Ridge and Send Hill. This Green Belt area is one of outstanding natural beauty which would be totally spoilt by this development. I also understand that the site subsoil contains hazardous land-fill waste, which may make the development economically unviable.

In conclusion, the Plan does not serve the interests of the local residents in Send, Ripley, Wisley and Clandon. The Council is going directly against the stated Conservative Government policy to preserve the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3303  Respondent: 15063745 / John Pryce  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development of the A35 Wisley Airfield site - also in the Green Belt. The idea of building 2000 homes would completely change the area and is totally inappropriate, particularly as this plan has already been previously rejected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3301  Respondent: 15063745 / John Pryce  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
| Comment ID: PSLPS16/3302 | Respondent: 15063745 / John Pryce | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a |

I object to the very late inclusion of the A43 Garlicks Arch site in the Plan. This is part of the Green Belt and should not be developed. It also has some ancient woodland on it which should be preserved. There is no pressing need for industrial space at this location, which, if needed at all, should be put on the Slyfield industrial estate.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

| Comment ID: PSLPS16/3304 | Respondent: 15063745 / John Pryce | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45 |

I object to the development of the A45 Talbot site, as this is in a conservation area, which obviously means it must be 'conserved' as it is.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
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<th>Comment ID: PSLPS16/3305</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to the locating of 4 traveller pitches on the A57 Paddocks site, as this is an area of great natural beauty, enjoyed by local residents, and is an inappropriate location for Travellers Pitches.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object mainly because of the 'in-setting' or removal of villages currently within the Green Belt, thus allowing excessive development in these villages. The Green Belt should be sacrosanct for future generations.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>Overall, I object to the disproportionate amount of development planned for this one area of the Borough</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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Comment ID: SQLP16/22  Respondent: 15063745 / John Pryce  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I object to the way this new Plan has been rushed through. There are significant changes to the old Plan which require full consultation under Regulation 18.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/27  Respondent: 15063745 / John Pryce  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

It is morally wrong to destroy the Green Belt - it MUST be preserved for our children, grand-children and future generations. To let it be built over is shameful, and Guildford Borough Council should do everything in its power to preserve it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1103  Respondent: 15063745 / John Pryce  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy A42, Clockbarn Nursery

The number of proposed homes has increased from 45 to 60, a 33% increase which is too many for this site.

It will worsen access and traffic problems in Tannery Lane and at the A247 junction.

It will continue the erosion of the Green Belt around Send which must be protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Policy A43, Land at Garlick’s Arch.

This block of land includes ancient woodland and should remain in the Green Belt.

Another 400 homes is far too many for this site and will cause excessive traffic to the local roads.

There is no proven demand for plots for Travelling Showpeople in this area.

There are insufficient schools and facilities to cope with such a large increase in the local population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Policy A58, Burnt Common Land

This part of the plan was deleted from the 2014 draft, because of all the objections raised. There is no reason why it should now be re-instated.

There is no demand for warehouse or industrial development on this part of the Green Belt when there are empty sites and industrial units at Slyfield and Guildford.

As with Policy A43, the increased traffic will cause gridlock to the already over-subscribed A3 as well as the local roads in Ripley and Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/214  Respondent: 15063745 / John Pryce  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P2, Green Belt

I object to the proposal to inset Send Business Park from the Green Belt because it is essential to conserve the Green Belt wherever possible. In this case Send Business Park is a non-conforming user in an area of outstanding countryside close the Wey Navigation, which is cherished by walkers of all kinds and from all parts of the country.

There is extremely restricted vehicular access along Tannery Lane, which makes expansion of this site totally inappropriate.

Overall, the Green Belt was designed to provide a cordon of countryside and green fields around London, and should be kept sacrosanct in respect of its original purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/302  Respondent: 15064481 / Colin and Sue Henderson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am responding to the proposal at the above location.

I object to the above proposal on the following 3 grounds:

1) I object to Send being removed from the Green Belt. All three of the proposals including the land behind the school and adjacent woodland will affect this.

2) I object to the proposed development at Garlick's Arch. This is a new site and was a late addition to the Regulation 18 draft. The extra traffic has not been mentioned and would be far too much for the site.

3) I object on the grounds that GBC have not followed the correct procedure. Full consultation will not be permitted under the short cut Reg. 19 which GBC are trying to implement. The "last minute" attitude to this proposal should not be permitted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Thirdly, I object to the proposed development at the Send Hill site. This again is a new development as well as including a site for Travellers - totally out of keeping.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Finally, I object to Send being removed from the "Green Belt" designation. It is a lovely area that serves to separate the already sprawling Guildford and Woking. Soon, there will be no differentiation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/28  Respondent: 15064481 / Colin and Sue Henderson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

To whom it may concern,

I object to the above proposal for the following reasons and want this message to be seen by the Inspector.

Firstly, I object to the fact that these proposals were added to the agenda at the last minute in the May meeting of this year. This alone is underhand, not to add reprehensible.

Secondly, G.B.C. have invalidated the whole process by not following the official guidelines and following procedures. A full consultation is required. This is a new proposal involving 400 + houses and warehouses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/11  Respondent: 15064673 / Steven Yadav  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This proposed plan was cynical pushed through last minute by the council, I strongly OBJECT to this monsterly of the plan ... building 400 homes and industrial site... there is no need... Guildford council should be shamed of proposing this plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I *strongly object* to the above plan. This is so shocking in every words.

Council cynically pushed through this proposed plan at the last minute.

There is no justification to build 400 homes and some industrial space on this site.

This site has a particular conservation sensitivity since it is covered in ancient woodland.

This plan is new and was not included in the regulation 18 draft and has NOT been consulted upon previously.

Please find below my home address and I want my comments to be seen by the inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to removal of Brownfield site (A34) from the Plan

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to removal of Brownfield sites (A4) from the Plan

Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**I object to the extended development in the Green Belt (Policy P2, Site A43)**

I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

---

**I object to the allocation of 6 Traveling Showpeople sites in A34 Garlick’s Arch**

The allocation of 6 Travelling Showpeople plots is the designated formula for 150-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlicks Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.

---

**I object to the potential and ill-defined increase in housing allocation at A43 Garlick’s Arch**

The potential of an increase from 400 houses at site A43 Garlick’s Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/2365  **Respondent:** 15064673 / Steven Yadav  **Agent:**

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**Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**I object to the unfair imbalance of the Plan across the borough.**

With the removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan has become even more biased against the North East of the borough. Guildford Borough is over 100 square miles. Of the11350 homes proposed in the Plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/2361  **Respondent:** 15064673 / Steven Yadav  **Agent:**
### Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

### I object to the proposal for a Waste Management Facility in Green Belt (A58)

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

Roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

### Comment ID: pslp172/2364  Respondent: 15064673 / Steven Yadav  Agent:

### Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

### The inclusion of site A58 Burt Common, removes the need for A43 Garlick’s Arch)

GBC’s own reasons for including Garlick’s Arch A43 in the 2016 version were

1. *The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm, ... (site allocation A25) [ than the Burnt Common site did ]”*
2. *The site [A43] provides the employment floorspace needed in the plan to help meet identified needs”*

Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (which are almost contiguous) are in the plan; therefore GBC are not following their own guidelines and objectives.

Since A58 Burnt Common is now in the Plan (2017) more than the “required” industrial space is available there, so there is no reason for Garlick’s Arch to be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

### Comment ID: pslp171/793  Respondent: 15064673 / Steven Yadav  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the hiding of development by “deferment” (A24, A25, A26, A43)

This version of the Plan has concealed some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects:

i) to hide the number of housed actually being built (A24, A25, A26 – total of 1100 deferred, but still being built!), and

ii) give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/12  Respondent: 15066017 / Claire Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Thank you for your letter regarding the Local Plan (Regulation 19) consultation. I write regarding Treetops Kennels and Loxhill Nursery, Old Portsmouth Road, Guildford, GU3 1LN. I would like to suggest that this site is included as an allocated site in the Local Plan. It is a site considered in the Land Availability Assessment. Please let me know if I can provide any further information.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/30  Respondent: 15066369 / Adam Fairbairn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I wholeheartedly object. The fact that there is a site in the first place for these plans to be proposed is bad enough. There is not enough space where it is being proposed and the fact that adding another junction for traffic will severely degrade traffic around Woking & Guildford which is bad enough during rush hour already. Adding many more houses and as well as that many more cars into a congested system will make things far worse. This is a terrible idea when the traffic is already crippled enough as it is. The A3 gets incredibly congested now due to all the people commuting to London and Guildford and this will exacerbate things massively.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/31  Respondent: 15066369 / Adam Fairbairn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

While this plan may be 'legally sound', what about the rights of all of the animals that have no legal side or entity which fights against the destruction of their homes? Putting all these buildings, homes and construction there will murder and eradicate many helpless animals that are only trying to fend for themselves in an already overpopulated area. I strongly object to these proposals for the good of not just the community, but for the wildlife community too. Of course, these plans will be conducted 'by the book' and will be legally sound but this is not the point then constructing houses and destroying habitat for the sake of unnecessary homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/32  Respondent: 15066369 / Adam Fairbairn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

This whole plan is unacceptable. There are already enough houses and in regards to the video and hospitals which are struggling, if it hadn't have been for the unnecessary cuts which have been enforced by our government, people wouldn't be struggling as they are. These plans will disturb an equilibrium with water drainage and cause flooding - look at Guildford over the winter for example, which suffered from flooding when all the water descended on the town. Adding more houses will require more drainage, foundations will be disturbed and this will only lead to even more flooding in the future.
If 400 houses were added and each house had 2 children for example, that's 800 additional children that need to be taught. You might add a school or two, but being able to teach 800 students in 2 schools is not going to be likely. In the end, this will have to be funded by us, the tax payers and the consequences of more houses also means the following:

More crime
More traffic
More pollution (light and sound)
More drugs
More rodents
More litter
Death and killing of many animals

The list goes on but that is just a sample.

Why is the green belt being targeted again?! It is green because it is meant to preserve ecology and encourage the growth of natural wildlife. Building houses has the opposite effect - more houses means more people and humans do what they naturally do (and might not necessarily be allowed to) and reproduce. Having more houses would end up being a catalyst for bringing more children into an already overpopulated world. I strongly object to these plans - the population is high enough already and giving people more space to bring more people in to the world only makes it worse. Do not complete these buildings and junctions.

These plans should not be reconsidered, they should be scrapped because:

- There is too much traffic already in Surrey
- There are enough people in Surrey
- The A3, Woking and Guildford are already under too much strain from traffic
- Building these houses is only going to be another haven for commuters to London where people who don't want to live in London come and Live in Woking/Guildford and go to London for their job. When I was working in London, the traffic coming from Woking was bad enough. Things will only spiral out of control and traffic in Guildford will become as bad as it is in London - it is already on its way to being like that already. Do not complete these plans for the sake of everyone.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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The Theatres Trust supports the proposed wording of Policy E6. It clearly aims to promote and protect community and cultural buildings, as guided by para. 70 of the NPPF.

* para. 4.4.57 needs to update the reference to 'policy 14' (from the previous consultation) with 'E6'.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/4369  **Respondent:** 15067361 / Nicola Adams  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Expansion of the village settlement boundary vs Local Plan 2003** (see attached maps)

- Together with the insetting policy, the proposed expansion of the settlement boundary vs LP 2003 would remove additional undeveloped green spaces from the Green Belt, rapidly hastening village expansion and encroachment on the neighbouring countryside. There is no supportable basis for this expansion which contradicts the NPPF policy that local planning authorities should “define boundaries clearly, using physical features that are readily recognisable and likely to be permanent” and the above government objective to safeguard the countryside from encroachment.

- I want to specifically highlight the area to the east of The Street currently outside the settlement boundary, including the Village Green and neighbouring undeveloped land which contributes to the village’s rural character, which would not be best served by being included in the settlement.

I challenge the village expansion as a whole and the area of the West Horsley Village Green/neighbouring fields specifically

1. **C) Strategic Site Allocations (A38-41)**

- 445 houses are proposed on four ‘strategic sites’ within West Horsley in addition to an undefined number of ‘windfall’ small site completions. Excluding the large site at Normandy, this represents 50% of the total proposed housing within inset villages despite representing only 20% of the current population.

- The proposal places a disproportionate burden of future housing provision on West Horsley relative to other villages, the impact of which would be a significant loss of village character and stress on amenities and roads which could be better addressed through a broader distribution of strategic sites across the borough.

In closing, I fully recognise the need for sustainable housing development within the borough to meet the current and future needs of its residents, but believe we must do so while also safeguarding our countryside and the rural nature of the villages which make this area unique.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

445 houses are proposed on four sites within West Horsley in addition to an undefined number of ‘windfall’ small site completions. Excluding the large site at Normandy, this represents 50% of the total proposed housing within inset villages despite representing only 20% of the current population.

The proposal places a disproportionate burden of future housing provision on West Horsley relative to other villages, the impact of which would be a significant loss of village character and stress on amenities and roads which could be better addressed through a broader distribution of strategic sites across the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1) This policy directly contradicts the government’s objective in the NPPF to “assist in safeguarding the countryside from encroachment”, and that “once established, Green Belt boundaries should only be altered in exceptional circumstances”. Normal population growth does not constitute exceptional circumstances which would justify removal of Green Belt status with the associated loss of rural character of the village.

Under the NPPF policy #86, “If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt.”

Ref West Horsley: As a minimum, the southern part of West Horsley (south of the railway line) strongly meets these criteria, being characterised by low housing density, open countryside views and bordering directly onto both National Trust and AONB lands, and should remain in the Green Belt with its existing boundaries intact. This area should be
considered separately to the northern area of West Horsley which directly adjoins East Horsley and is developed to a greater degree (though still a rural village).

2) Expansion of the village settlement boundary vs Local Plan 2003

Together with the insetting policy, the proposed expansion of the settlement boundary vs LP 2003 would remove additional undeveloped green spaces from the Green Belt, rapidly hastening village expansion and encroachment on the neighbouring countryside. There is no supportable basis for this expansion which contradicts the NPPF policy that local planning authorities should “define boundaries clearly, using physical features that are readily recognisable and likely to be permanent” and the above government objective to safeguard the countryside from encroachment.

I want to specifically highlight the area to the east of The Street currently outside the settlement boundary, including the Village Green and neighbouring undeveloped land which contributes to the village’s rural character, which would not be best served by being included in the settlement.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: WH_Boundaries.png (520 KB) WH_The_Street_Boundaries.png (2.5 MB)

Comment ID: PSLPP16/17834 Respondent: 15067361 / Nicola Adams Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a resident of West Horsley I write to you with regards the Guildford Borough Proposed Submission Local Plan (Reg 19) 2016 draft which was issued in April, and is now under public consultation.

Having reviewed the submitted document, I am very concerned at the potential implications for the rural village of West Horsley, and challenge the following key points:

1. A) Policy P2: Removal (‘insetting’) of the village from the Green Belt

- This policy directly contradicts the government’s objective in the NPPF to “assist in safeguarding the countryside from encroachment”, and that “once established, Green Belt boundaries should only be altered in exceptional circumstances”. Normal population growth does not constitute exceptional circumstances which would justifiably remove of Green Belt status with the associated loss of rural character of the village.

- Under the NPPF policy #86, “If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt.”
As a minimum, the southern part of West Horsley (south of the railway line) strongly meets these criteria, being characterised by low housing density, open countryside views and bordering directly onto both National Trust and AONB lands, and should remain in the Green Belt with its existing boundaries intact.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: SQLP16/33</th>
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<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

The evidence base identifies a wide uncertainty range in future housing demand, which may not require the volume of development outlined in the LP. This range has not been acknowledged in the proposed submission LP, which may result in excessive development and non-essential loss of rural sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: SQLP16/34</th>
<th>Respondent: 15067361 / Nicola Adams</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

No, not consistent with national policy - interpretation of the NPPF to allow removal (inset) of land from the green belt is highly questionable and will have permanently damaging consequences for the Surrey countryside.

No, not justified - as commented in question 1, this level of proposed development is inconsistent with the low-side housing demand estimates and encourages excessive development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/17</th>
<th>Respondent: 15067393 / Anthony Fairbairn</th>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P2 why is Send being removed from the Green Belt? There is no sound reason for this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/50  Respondent: 15067393 / Anthony Fairbairn  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to express my objection to the proposed development of Garlick’s Arch in Send.

The council have not followed the correct planning process in that there have been significant changes which now require full consultation under Regulation 18.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/51  Respondent: 15067393 / Anthony Fairbairn  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A 43 Over 400 houses would need an impact assessment on local services ie GP, hospital and schools. There is no need for industrial land at Garlick’s Arch, this should be allocated to Slyfield. Further junctions added to the A3 would created traffic chaos in Send – there is already gridlock daily at rushour. Destruction of ancient woodland (possibly with bat population) would cause runoff down the hill to Send Marsh Road, creating a flood risk.

I would like my comments to be seen by the Inspector.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to this plan.

GBC have not followed the correct process in that the plans have been changed and a new junction to the A3 added which will cause major flow problems in Send and which is already gridlocked every rush hour and cannot handle any increase.

Have the council considered the knock on effect on local services like GP, schools and hospital?

The industrial site at Send is not needed and should be on BROWN FIELD site at Slyfield.

GBC's Transport Assessment was not available to councillors when the vote was taken on 24th June.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object because there have been significant changes to the document which require a full consultation under Regulation 18, not Regulation 19.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<thead>
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<th>Comment ID: SQLP16/39</th>
<th>Respondent: 15067393 / Anthony Fairbairn</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): (No)</td>
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</table>

I object because GBC have failed to provide sound evidence in terms of employment land needs assessment 2015 which shows an 80% reduction in employment needs compared with the assessment made in 2013. This means that industrial space at Burnt Common is no longer needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/42</th>
<th>Respondent: 15067393 / Anthony Fairbairn</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): (No)</td>
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</tbody>
</table>

I object because due process was not followed as when the council took a vote on the plans when the Planning Assessment 2015 was not made available to those voting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: SQLP16/41</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
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</tbody>
</table>
I object to Policy P3, Policy A43, A44.

The woods at Garlicks Copse date from the sixteenth century. To rip them up would allow water to flow down the slope to Send Marsh Road and put houses in Send Marsh Road at risk of flooding.

Plans need to take into account traffic flows, especially through Send which is already bad during rush hours.

Housing developments need to take into account the knock on effect on local services - hospitals, GP's and schools.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Green Belt, Policy 2 at paragraph 4.3.15
Send Business Park now taken out of the Green Belt a/together
I object to the proposal to inset Send Business Park from the Green Belt because:

It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
There is highly restricted vehicular access along Tannery Lane in both directions
Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2847  Respondent: 15067393 / Anthony Fairbairn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---
Land at Garlick's Arch, Send Marsh, Policy A43. Now 400 homes and 6 Travelling Show people plots
I object to the Policy A43 change at Garlick's Arch because:
• It ignores all the thousands of previous objections made by local people
• There is no proven demand for Travelling Showpeople plots in this location
• It is beautiful permanent Green Belt and no "exceptional circumstances" exist
• It will cause over-development of our village and the number of homes is excessive
• It is exquisite ancient woodland that existed at the time of Elizabeth I
• It will join up Ripley and Send and defeat the key purpose of Green Belt
• It is subject to frequent flooding and is currently a flood zone 2 allocation
• It is contaminated by lead shot accumulated over fifty years
• It will generate excessive traffic that will block up the local roads of Send and Ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: pslp172/2848  Respondent: 15067393 / Anthony Fairbairn  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Burnt Common, London Road, Policy A58. Now a new a/location for a minimum of 7,000 sq m of industrial or warehousing I object to Policy A 58 at Burnt Common because:
• It was deleted from the 2014 draft because of all the objections made previously
• The word "minimum" is a change from the previous "maximum" in the 2016 plan and since that time there has been a decline in demand for industrial land
• There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
• The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt
• The impact on small surrounding roads will create traffic gridlock
• It will join up existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPS16/13  Respondent: 15067425 / Anita Fairbairn  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I strongly object to this proposal. The site has a particular conservation sensitivity as it is covered in ancient woodland dating from the 16th century. I believe there are bats in this location. There is no need for new houses on top of the 13,860 already proposed for the borough. Building residential homes on this site is crazy. The noise from the A3 will be deafening for the residents. Homes will be very close to electricity pylons.

There will be an unacceptable increase in traffic on the already busy Portsmouth Rd. Send Rd will become gridlocked. The proposed industrial development of 7000 sq m is not required.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID: PSLPS16/16  Respondent: 15067425 / Anita Fairbairn  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object strongly to the proposal. There will not be enough school places for the children of the residents of the proposed 400+ houses. The proposal will also put an unacceptable strain on the existing GP surgery where it is difficult enough to get appointments now.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID: PSLPS16/14  Respondent: 15067425 / Anita Fairbairn  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to this proposal. It will create an unacceptable level of traffic on Send Road. Send would become the through route to Woking for traffic leaving the A3 and the M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID: PSLPS16/15  Respondent: 15067425 / Anita Fairbairn  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44**
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<tr>
<th>Comment ID: PSLPP16/27</th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this proposal. This site is new and was not included in the regulation 18 draft and has not been consulted upon previously. Development for housing is inappropriate due to its permanent Green Belt status and high quality Green Belt amenity within an area of beautiful countryside which would be spoilt by any development. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers pitched is inappropriate due to the narrow width single track country road providing insufficient access to the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/26</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposals at Garlick's Copse. The woodland in this area dates back to the 16th century and should be preserved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the plan for Garlick's copse. By destroying the wood and building on the fields I believe a flood risk for the residents of Send Marsh will be created caused by run off.</td>
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<tr>
<td>I object to this plan. Every major site in Send proposed by GBC has been changed and a massive new road junction has been added. The 2014 proposal for 430 houses went down to 185 in April 2015 and has now gone up to 485. These significant changes require another full consultation under Regulation 18</td>
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<tr>
<td>I object to this plan. Every major site in Send proposed by GBC has been changed and a massive new road junction has been added. The 2014 proposal for 430 houses went down to 185 in April 2015 and has now gone up to 485. These significant changes require another full consultation under Regulation 18</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I object to this plan. Significant changes to the plans for Send require a full consultation under Regulation 18, not Regulation 19.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: SQLP16/40 | Respondent: 15067425 / Anita Fairbairn | Agent: |
|-----------------------|----------------------------------------|
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I object. I do not believe the plan to be sound because GBC have failed to provide sound evidence in terms of Employment Land Needs assessment 2015 which shows an 80% reduction in employment space from the previous ELNA carried out by GBC in 2013. This means that industrial space at Burnt Common is no longer needed. Housing numbers from the SHMA may not be accurate. The number of foreign students has been wrongly used to inflate the need. The required 13,860 houses in the local plan is exaggerated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: SQLP16/43 | Respondent: 15067425 / Anita Fairbairn | Agent: |
|-----------------------|----------------------------------------|
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I object to this plan. I do not believe that GBC has fulfilled its duty to cooperate. The Transport Assessment was not available to councillors for the vote taken on 24 May. The Garlick's Copse site in Send is new and was not included in the Regulation 18 draft and has not been consulted upon previously (Policy A43.30 ha). Land west of Winds Ridge and Send Hill (Policy A44.1.9 ha) is new and was not included in the regulation 18 draft and has not been consulted upon previously.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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</table>

Green Belt, Policy 2 at paragraph 4.3.15
Send Business Park now taken out of the Green Belt altogether
I object to the proposal to inset Send Business Park from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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</table>

I object to: Clockbarn Nursery, Tannery Lane, Policy A42 this is now 60 homes in place of 45 homes previously.
I object to the Policy A42 change at Clockbarn in Tannery Lane because:
- The increase to 60 homes in place of 45 homes is 33% more and too much
- It ignores all the hundreds of previous objections made by local people
- It will worsen access and traffic problems in Tannery Lane and at the A247 junction
- It will make erosion of the Green Belt in our village worse
- It will make surface water flooding, which is already bad, even worse
- It will impact open countryside views from the River Wey Navigation

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Land at Garlick's Arch, Send Marsh, Policy A43. Now 400 homes and 6 Travelling Show people plots
I object to the Policy A43 change at Garlick's Arch because:
• It ignores all the thousands of previous objections made by local people
• There is no proven demand for Travelling Showpeople plots in this location
• It is beautiful permanent Green Belt and no "exceptional circumstances" exist
• It will cause over-development of our village and the number of homes is excessive
• It is exquisite ancient woodland that existed at the time of Elizabeth I
• It will join up Ripley and Send and defeat the key purpose of Green Belt
• It is subject to frequent flooding and is currently a flood zone 2 allocation
• It is contaminated by lead shot accumulated over fifty years
• It will generate excessive traffic that will block up the local roads of Send and Ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2846  Respondent: 15067425 / Anita Fairbairn  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Burnt Common, London Road, Policy A58. Now a new a/location for a minimum of 7,000 sq m of industrial or warehousing I object to Policy A 58 at Burnt Common because:
• It was deleted from the 2014 draft because of all the objections made previously
• The word "minimum" is a change from the previous "maximum" in the 2016 plan and since that time there has been a decline in demand for industrial land
• There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
• The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt
• The impact on small surrounding roads will create traffic gridlock
• It will join up existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/1292  Respondent: 15067585 / Ann Elms  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

THE FINAL DRAFT LOCAL PLAN (SEND) OBJECTIONS

Please make sure that my views are made known to the Planning Inspector.

Below are the key points I wish to make in connection with the Final Draft Local Plan: Procedural objection

Since 2014 when Guildford Borough Council aired for public comment, nearly every major proposed development site in Send has been changed. Regulation 18 should have been used requiring another full consultation instead of these brief six weeks since there are very significant changes to what is proposed for Send.

I object to the inclusion of major changes to the developments in Send which should receive full consultation instead of six weeks

Green Belt - Policy P2

In the publication 'About Guildford' sent out by Guildford Borough, there is the statement 'Over 89% of our borough is within the green belt'. Why are GBC proposing to remove Send altogether from the Green Belt? Why aren't GBC fighting to keep Send in the Green Belt?

Why has Send been disproportionately hit by development? Is it because the majority of the Councillors/Officials involved live in a different area, rather than in the Send Area? Is there corruption involved with links with building companies?

The village of Send must be preserved in its village identity to prevent there being an urban sprawl between Guildford and Woking.

I object to any erosion of Send's Green Belt status under Policy P2.

Housing Need - Policy A43

In the publication 'About Guildford' it is stated that 'less than 700 homes per year will be built in total'.

Why are most of these homes being built in the Send Area? There are brown field sites which could be developed elsewhere, rather than in our beautiful Green Belt area around Send.
Why has Garlick's Arch suddenly been included at the last minute in the Development Plan? This doesn't match with the statement 'Only 1.6% of greenfield land will be taken and allocated for development' (again in the publication 'About Guildford'). No time has been given for adequate consultation here and it has not been included in previous consultations.

Is all the greenfield land coming from the Send and Ripley area?

The NPPF prevents the merging of settlements without any exceptions. Why has this been proposed?

I object to the proposed development of Land at Garlick's Arch, Burnt Common. Policy A43

However, I have no objection to the development of 45 houses at Clockbarn Nursery, Tannery Lane.

Ancient Woodlands

There are ancient woodlands at Garlick's Arch and this area should be conserved. There are trees dating back to the 16th century which could be felled or damaged.

I object to the encroachment on ancient woodland. Policy A43

Industrial and Warehouse Development

Why has industrial and warehouse space of 7000 sq. m. been proposed? There is room at Slyfield which should be fully developed to prevent proliferation of industrial areas in the Surrey Countryside. Keep them all on one site. Traffic would be intolerable for the residents in the Send area. The nature of the village of Send would be irrevocably changed by so much traffic.

I object to the proposed 7000 sq. m. industrial development at Garlick's Arch, Burnt Common. Policy A43

4-way Interchange with A3

I note a new 4-way interchange is proposed onto the A3 at Burnt Common to serve the Garlick's Arch development. Traffic is already bad on the A247 and it is gridlocked every morning. It would become intolerable if this development took place. It is already gridlocked in the morning and traffic would be at a standstill in the area. Send Barns Lane would become a through route for Woking.

I object to the development of the proposed new 4-way interchange from the A3 at Burnt Common. Policy A43

Travellers' Pitches and homes on Landfill area

I also note that there are other new inclusions under Policy A44 for the inclusion of 40 homes and 2 travellers' pitches. This is absolute madness to build on landfill. Breathing pipes are in place to vent the landfill. People who live there would suffer ill health. The lanes around there are far too small to cope with travellers and their caravans. It is a country lane and unfit for development.

In addition, procedural regulations have now been followed. This should have been put out for fuller consultation under Regulation 18.

I object to the development of Land West of Winds Ridge and Send Hill, Policy A44 for 40 new homes and two Travellers' Pitches.

Guildford Green Belt Councillors representing Send
In addition, I wish to protest at the lack of courtesy to our two democratically elected councillors representing our area at planning meetings. Their voices should be heard more attentively. They represent rate-paying members of Guildford Borough Council.

I object to the discourteous treatment of our two Councillors, Susan Parker and Mike Hurdle.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Latest Development Proposals**

I OBJECT. Full consultation under Regulation 18 should occur in respect of the new proposed development given the wide divergence from the earlier 2014 and April 2016 identified needs and sites.

GBC evidence of the scale of the proposed development.

The 2015 ELNA Assessment indicates an 80% reduction in employment space requirements from the previous assessment which would mean that industrial space at Burnt Common is no longer needed.

I would question the criteria assessing the need for so many new houses (693 per annum for 20 years) and that in fact actual realistic requirements could be built on Brown field sites without reverting to blighting Green Belt.

I therefore OBJECT.

**Proposal to Remove Send and Ripley Villages from the Green Belt**

I OBJECT. This will destroy the ambience, amenity and individuality of both and in the case of Ripley a significant piece of history.

**Land at Garlick's Arch**

This proposal for 400 houses and 7000 sq m of B1c, B2 and B8 Industrial/Storage on this site is new and was not addressed in the Regulation 18 draft. This is Green Belt land permanently protected which is especially significant in the regard because of the presence of ancient woodland. Why another 400 homes? ...there is no need.

I therefore OBJECT.

Sheet 1 of 2

**New 4 Way Interchange for the A3 at Burnt Common**
This would destroy Send Village: also Clandon. The A247 which runs through the Village would be utilised as a major artery into Woking and would be subject to almost constant gridlock not to mention health issues in respect of exhaust emissions.

I therefore OBJECT.

Land West of Send Hill and Winds Ridge: Proposed Housing and Traveller Pitches

This is protected Green belt land and has not been referenced previously in the Regulation 18 Draft. I therefore OBJECT.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3661  Respondent: 15067585 / Ann Elms  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have already objected in previous consultations to the Local Plan but this latest draft has become just plain ridiculous. Why is Send bearing the brunt of development and why isn't there development south of Guildford, where I believe a lot of the councillors live?! To move to detail, here are my objections to the latest proposals.

I object to Policy A42, Clockbarn Nursery, Tannery Lane, where the number of houses has been increased to 60, instead of 45. This is just plain madness. The local infrastructure will not support such a huge development, which is 33% more than what was previously proposed, and that was far too much. Traffic will be gridlocked every morning throughout Send, right through Send Road and Send Barns Lane. It is frequently at a complete stand still every workday morning already and it will be impossible to circulate in Send at rush-hour times.

The Green Belt will be eroded and Send will no longer be a village but will become a suburb of Woking and Guildford. The whole atmosphere will be completely changed in the village. The beautiful open countryside views from the River Wey will be lost for ever with this badly planned over-development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3662  Respondent: 15067585 / Ann Elms  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to **Policy A43 change at Garlick's Arch** because existing objections have been completely ignored and Guildford Borough Council are riding rough shod over the objections they have already received. This area is permanent Green Belt and no proposed study has been done as to why this is necessary. This area is ancient woodland going back to Tudor times and is, again, over-development of Send village. Why, oh why, is Send being penalised in this way? There has been no proper planning and seems to be a whim and a general desire to ruin and destroy the Green Belt and the village atmospheres of Send and Ripley. There will be no separate villages, just one sprawling conglomeration if this development takes place.

Again, all the roads surrounding Send and Ripley will be one big traffic jam every morning and evening and for a large part of the day.

Where is the proven demand for Travelling Showpeople plots in this location? What is the evidence for the need of Travelling Sites?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID:</th>
<th>pslp172/3663</th>
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I object to **Policy A58 at Burnt Common** and I am a resident very close to this development. Thousands of objections were received previously and it was taken out of the 2014 draft and it now back in but with a possible huge increase in the number of industrial units. There is plenty of room at Slyfield and Guildford where there are still empty sites and industrial units. I understand the 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough so it really is unreasonable to allocate 10 hectares at Send in the Green Belt area.

Again there will be traffic gridlock with traffic leaving this industrial site, meeting traffic coming up Send Barns Lane, and the whole traffic circulation will become untenable for residents and traffic passing through the area.

Ripley and Send will again be forced into becoming a sprawling suburb and will lose their village atmospheres and cultures.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID:</th>
<th>pslp171/1854</th>
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</table>
I fiercely object to **Green Belt, Policy 2 at paragraph 4.3.15** to remove Send Business Park from the Green Belt. This area should not really exist in the first place as it is in an area of beautiful countryside next to the Wey navigation system. Traffic access will be a nightmare in both directions and further development is completely inappropriate and will ruin the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPA16/197  
Respondent: 15068257 / Thomas Tuck  
Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

8) I object to the lack of immediate provisions of new Doctors Surgeries

9) I object to the lack of immediate provisions of new schools

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPS16/269  
Respondent: 15068257 / Thomas Tuck  
Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

2) I object to site A43 Garlic Arch

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
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<th>Comment ID: PSLPS16/270</th>
<th>Respondent: 15068257 / Thomas Tuck</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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<td>3) I object to site A43a the on and off ramp at Clandon</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45</td>
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<td>5) I object to site A45 The Talbot</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57</td>
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<td>4) I object to site A57 The Paddocks</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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</table>
I OBJECT TO THE 2016 DRAFT LOCAL PLAN on the following points:

1) I object to the erosion of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

6) I object to "in-setting", removal of villages from Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

5) I object to the erosion of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
7) I object to last minute inclusion of new sites with less than 2 weeks notice

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/8  Respondent: 15068737 / Angela Blaydon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Since the previous ELNA evidence, there has been an 80% reduction in employment space required, thereby rendering the industrial space proposed at Burnt Common surplus to requirements. GBC have failed to provide sound evidence for the proposed development at Garlick’s Arch and have also exaggerated the number of houses required locally. If population growth is to be around 20,000, then the Borough will only require around 8,000 homes and not the proposed requirement of nearly 14,000. There are plenty of brownfield sites within the borough to accommodate around half of the homes actually needed and thereby negating the need to build on green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/22  Respondent: 15068737 / Angela Blaydon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43.

I object to the development of the 30 ha of land at Garlick’s Arch. This refers to a completely new site added to the local plan and was not included in the Regulation 18 draft and has not been consulted upon. This land is Green Belt permanently protected by the NPPF that prevents the merging of settlements. There are no exceptional circumstances. In fact the site is covered in ancient woodland and there is no reason to build here as this would be in excess of the already proposed numbers for the Borough. The proposed industrial development would be better served by locating at Slyfield with other industrial units. In fact the company involved would prefer to be at Slyfield as it is more convenient for them. An increase in the junction at Burnt Common would increase substantially the traffic flow in the area, which, when there is a problem on the A3, gridlocks the local roads already. With easier access to and from the A3 this would increase the amount of traffic substantially on local roads, with M25 traffic using the A3/Send route to Woking, and include movement from any proposed housing at Wisley and Burpham if actually built.
Policy A44.

I object to the 1.9 ha of land west of Winds Ridge and Send Hill being built upon as this is also a new proposal and was not included in the Regulation 18 draft. It has not been consulted upon previously. This land has green belt status and any development would be detrimental to the area. The land in this area was once land fill waste and the subsoil is therefore unsafe for building upon, apart from the fact that it is serviced by a narrow width single track country road.

I further object on the grounds that there seems to be no thought given to local infrastructure to cope with the proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Policy P2.

I object to Send being removed from the green belt. If the proposals go ahead we lose more green space and this could then open the door for development on surrounding green belt land that will eventually join Woking and Guildford into one large conurbation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
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<th>Comment ID: SQLP16/44</th>
<th>Respondent: 15068737 / Angela Blaydon</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

**Objection to Proposed Local Plan**

**Please Note:** I want my comments to be seen by the Inspector and please make your responses personal.

GBC have made significant changes to proposed developments in and around Send and Ripley and now seem to propose the building of 485 houses and a full new road junction on the A3 at Burnt Common, but there is no indication of another full consultation. I object to this as GBC have invalidated the whole process by trying to use Regulation 19 rather than the correct course of action detailed in Regulation 18.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send Marsh/ Burnt Common</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I object to **Policy 2 at paragraph 4.3.15**, because it is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation. There is also extremely narrow and restrictive access to this area in both directions making heavy vehicular access very difficult. Further development here is inappropriate and again will be imposing on Green Belt land.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<table>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
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I object to Policy A42 because this amendment is a 33% increase to the original plan putting even more stress on local infrastructure and totally ignoring the hundreds of previous objections made. This increase will also add to already bad traffic problems and is eroding more Green Belt. Apart from impacting on the views from the Wey Navigation it will undoubtedly have a serious effect on already bad flooding in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/168  Respondent: 15068737 / Angela Blaydon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A43, which is ignoring the thousands of previous objections as well as adding travelling showpeople plots for which there is no proven demand. This is Green Belt land and there are no exceptional circumstances existing to warrant granting permission for this development on exquisite ancient woodland dating back at least to the 16th century. This development will also erode any division between the villages of Ripley and Send and defeats the key purpose of Green Belt. This land currently has a flood zone 2 allocation and therefore unsuitable for habitation, apart from the fact that the soil is contaminated by lead shot and will generate excessive traffic onto already heavily used local roads that are also already in an appalling condition.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/169  Respondent: 15068737 / Angela Blaydon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to **Policy A58**, because

1. it was deleted from the 2014 draft;
2. is now a **minimum** instead of the original **maximum** square meterage;
3. there is no demand for industrial land in the area, which is Green Belt, when Slyfield and Guildford still have empty sites and industrial units. The 2017 Employment Land Need Assessment shows a **reduction** in demand to 3.0 hectares for industrial land for the whole borough not a **huge over allocation of 10 hectares at Send in the Green Belt**;
4. again, this will impact significantly on small local roads creating traffic gridlock;
5. it will also remove the Green Belt land between Ripley and Send, defeating the purpose of Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/121  **Respondent:** 15076513 / Ian Groden  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Forgive the additional comment but I have only just accessed the Strategic Highway Assessment Report Assessment, dated 6 June, which, somehow, I did not have before me on the 7th.

I am unable to ascertain from the report whether projected traffic statistics have been made for actual movement on the Burnt Common roundabout itself, which will have to accommodate increased traffic from many directions under the Plan.

I believe this is a critical point and I assume satisfaction on the ability of the roundabout to cope will be an essential requirement.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLP16/24  **Respondent:** 15076513 / Ian Groden  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object re Policy A43 - Land at Garlick’s Arch, Burnt Common and Policy A43a re land for new north facing slip roads to/from A3 at Send Marsh/Burnt Common

1. The 2014 proposal for 430 houses went down in April 2016 to 185 in the face of significant local opposition to disproportionately high proposed development in Send. The method of late inclusion of a new very substantial development is of great surprise. Should this not require a full consultation under Regulation 18?

2. Is Industrial space still actually required at Burnt Common since I understand the Employment Land Needs Assessment 2015 (ELNA) shows an 80% reduction in employment space need from the previous ELNA. In any event, a full case has been presented for such development at Slyfield which appears a superior choice.

3. I still have doubts about real Housing need numbers and ask you to re-examine the treatment of foreign students in the numbers.

4. I strongly object to the removal of Send from the Green Belt (Policy P2) and also building along the Portsmouth road and the A3 on the Land at Garlick’s Arch. It may not be of marked beauty but it provides a vital role as countryside rather than town and a “breathing space” break for residents and travellers. What are the exceptional reasons for taking it out of Green Belt?

5. I believe the infrastructure of Schools, Doctors, Shops will be unable to cope- have they been consulted? In addition the, recently reduced, bus service is minimal.

6. My major concern is about the huge impact of such a development on Burnt Common Roundabout and the Send Road, A247, which already has high use and peak hour queuing. The plan talks of “quality of life and environment” but the effect of future increased noise, emissions, crowding - all factors to adversely affect existing residents who chose to live here, as opposed to future projected through traffic users - does not seem to be taken into account. Road schemes to try to maintain the same throughput rate on higher volumes does not make life nicer for local residents but is purely an efficiency exercise.

7. If increased car usage from this housing development, with increased heavy commercial traffic from the industrial site, were then added to by developments at Wisley and also Burpham also wishing to use this roundabout and route, then an ugly local environment will have been created.

8. Needless to say, a new changed interchange on the A3 would introduce substantial volumes of changed traffic movement from the M25 and A3 and destroy this pleasant village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4184  Respondent: 15076513 / Ian Groden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

With reference to my e-mails of 7 June and 16 June below, I wish to record further objections based on additional aspects which have come to my attention:

I object to the fact that, I understand, sites in or adjacent to Send could deliver almost half the number of houses planned to be delivered for the next 15 years in the GBC Spatial Strategy. If true, this is a totally unfair and disproportionate burden to be imposed on the residents of this modest village, involving heavy increases in traffic on the Burnt Common Roundabout and Send Road, which would only be further increased if the new slip roads are created in connection with the Garlick’s Arch development application. Why cannot a system of fair burden-sharing of new development be applied to the existing settlements across the Borough, in proportion to size? Particularly as the developments will lead to vastly increased car use,
congestion, overstretched social infrastructure and more greenhouse gas emission, noise and light pollution to affect this community so badly?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/4190   Respondent: 15076513 / Ian Groden   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that land will be removed from the Green Belt before detailed traffic assessments and confirmed road improvement approvals are in place to prove development is possible. Adequate infrastructure provision should be a precondition of sustainable development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/4187   Respondent: 15076513 / Ian Groden   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I further object to building on green belt because I am reminded that it is an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is truly precious beyond the short term demands of the present Government’s policy or a 15 year plan. It benefits public health and wellbeing, physical and psychological health. Chipping away at a natural heritage can only lead to more future cuts to benefit developers and the radical transformation of a largely rural borough into a mainly urban or suburban one.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/4195   Respondent: 15076513 / Ian Groden   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I strongly object to the removal of Send from the Green Belt(Policy P2) and also building along the Portsmouth road and the A3 on the Land at Garlick’s Arch. It may not be of marked beauty but it provides a vital role as countryside rather than town and a “breathing space” break for residents and travellers. What are the exceptional reasons for taking it out of Green Belt?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/767  Respondent: 15076513 / Ian Groden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the figures for new homes, particularly in a post-Brexit world. These now need to be revised downwards. Is the planned number anyway deliverable if infrastructure has not yet been sorted out?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/27  Respondent: 15080865 / Adar Sinai  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We are writing to object to the proposed development at Garlicks Arch in Burnt Common policy A43. This proposal was added at very late notice after previously being assured by the council leader there would be no significant new changes to the DLP in Send. The use of regulation 19 further adds to the betrayal. This enormous new proposal must require a full consultation under regulation 19. The 2014 proposal for 430 houses was rightly reduced to 185 in April 2016. This late and hasty attempt to push through this plan increases the number to 485! A totally excessive and unneeded number based on inflated projections of population growth by GBC. The proposed light industrial units can easily be accommodated at Slyfield and the proposed 4 way junction to the A3 will cause traffic gridlock, noise and air pollution for local residents. All this without yet mentioning this 100 acre site is GREEN BELT (a word no longer found in the GBCs dictionary). With prime agricultural land, rare enough in Surrey, and ancient 16th century protected woodland within the boundary, this land must be saved. There is a brook running through the middle of the site essential for drainage and the area is prone to flooding already. The site prevents urban sprawl between Ripley and Send vitally important. The villages medical center already extremely busy and local schools cannot cope with the 25% population growth this plan will bring to our village. We have received emails from relevant ministers and Sir Paul Beresford stating government policy is to protect the Green Belt and listen to local residents in these matters. Why does GBC neither protect or listen to those it is elected to represent. Conservative Councillors ran for election on a protecting the Green Belt, not elected they stab us in the back.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/28  Respondent: 15080865 / Adar Sinai  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Finally we also object to policy A44 West Ridge and Send hill. Again this site is new, not included in the regulation 18 draft and not previously consulted on. This is high quality Green Belt land. The subsoil of the site contains documented land fill waste and is vented, making it totally unsuitable for development. Access is completely insufficient.

Please reject these proposals they are unwanted, unnecessary and have zero local support.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1924  Respondent: 15080865 / Adar Sinai  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
As residents of Burnt Common our area has been threatened with irreversible and excessive development on all sides completely destroying what is left of our rural landscape.

I object to policy a42 change at Clockbarn in Tannery Lane because;

there has been a 33% increase in planned new homes from 45 to 60 ignoring hundreds of previous objections and adding to traffic congestion at the a247 junction. Contributing to increased surfaced water flooding which already exists. It will impact on the countryside surrounding the river wey navigation and it is greenbelt land which should not be built on.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp172/1925</th>
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</table>

I object to policy a43 Garlick's Arch;

once again, thousands of previous objections have been ignored and again there is no demand for so many houses or travelling show peoples plots at this location. This land is permanent green belt, and no exceptional circumstances exist for development. It is prime agricultural land and contains ancient woodland that has existed since Tudor times. Again, this area is prone to frequent flooding and contaminated by lead shots accumulated over 50 years. Living in Burnt Common Lane, we will be massively effected by this excessive development and planned new junction to the a3, massively increasing traffic in our area. Once again, this is green belt land that should not be built on, this will also join Send and Ripley into one continuous inhabited area, defeating the purpose of the green belt in separating our villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to policy a58 at Burntcommon;
it was deleted from the 2014 draft because of objections but now has been re-added to the plan. along with Garlick's arch which previously replaced it. Even worse, the word minimum has been changed to maximum, despite a decline in demand for industrial land. Why plan an industrial development in the middle of the greenbelt, when Slyfield and Guildford still have empty units? The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough, not an excessive allocation of 10 hectares at Send, once again, this is green belt land and should not be built on. The increased traffic caused by this development and the Garlick's arch development and the new a3 junction will choke our village to death with congestion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: pslp171/583</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy 2 at paragraph 4.3.15;
I object to the proposal to inset Send Business Park from the green belt because there is highly restricted vehicle access along Tannery Lane, which is very narrow. This is an area of outstanding countryside adjacent to the beautiful river Wey navigation and once again this is another attack on the green belt, which is inappropriate and should be protected at all costs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/30</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I would like to record my objection to the planned local development A44.19ha

I live locally in [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] and my mother lives on Send Hill, i moved locally so i can look after my mother as she gets older - we moved to Send a few years ago as it is surrounded by a lot of greenbelt which is perfect for walks and running.

We purchased both properties after carefully selecting the area as village life is important, we did not expect a mass of houses to be built right behind my mothers property and certainly do not approve of 'Travellors' being GIFTED land - we have both worked hard and paid a LOT in taxes over many years, [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it] I feel by allowing this plan to proceed you will place undue stress, fear which would be detrimental to my mothers health.

There is plenty of land far more suitable near the 'Eubanks' auction house between the A3 and the slip road from the A3 towards Send.

Surely you can see the proposed plot A44 is not suitable or fair and therefore i strongly OBJECT to this

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/32  **Respondent:** 15081217 / Xinh Tu  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I am a local resident at Send Marsh, having studied your A43 and A43A proposal - I STRONGLY

1- OBJECT to this development of 7000sq m of the Industrial Units and Warehouses to be built on this Protected Green Belt zone . Let it be somewhere else more industrial-like area.

2- OBJECT to this Industrial Units and Warehousing because development is inappropriate in our area in such a small village the Guildford Borough Council have inappropriately recommended to the developer and approved.

3- OBJECT to the build of new 4-way interchanging traffic onto A3 at Burnt Common. Building this will encourage heavy traffic with tons in weight leaving A3 routing via Send and Ripley, air pollution is increased, trees will be dried, covered with diesel carbon dirt, road will become gridlocked and resident health will be affected.

Please re-consider

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
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<th>Comment ID: PSLPA16/10</th>
<th>Respondent: 15081281 / Sabine Marke-Deleau</th>
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<td>I object to the evidence. GBC failed to provide acceptable evidence in the terms of the Employment Land Needs Assessment 2015. The industrial space at Burnt Common is no longer needed. The housing numbers from the SHMA are highly questionable. The number of foreign students has been wrongly used to inflate the need. The required 13,860 houses in the local plant is exaggerated and far too high. <strong>The Green Belt does not need to be built over and brownfield sites should be used.</strong> GBCs Transport Assessment was not even available to councillors for the vote taken on 24th May. Infrastructure overload has had little attention.</td>
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<td>I object to Policy A43 30 ha Land at Garlicks Arch, Burnt Common, designated for 400 houses and 7,000 sq m of industrial and warehousing. There is no need for any more houses on top the 13,860 already proposed for the borough. This is Green Belt permanently protected by the NPPF which prevents the merging of settlements and there are no exceptional circumstances and the area has ancient woodland with trees from the 16th century. Our roads could not take the traffic and would cause long delays and possible frequent gridlocks.</td>
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I object to Policy A44. 1.9 ha Land west of Winds Ridge and Send hill being designated for 40 homes and 2 travellers pitches. This site is new and was not included in the regulation 18 draft and has not been consulted upon previously. Again, this is green belt and needs protecting. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is inappropriate due to the narrow width single track country road providing insufficient access to the site and widening this would be destroying our countryside further.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/32  Respondent: 15081281 / Sabine Marke-Deleau  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy P2. Send should not be removed from the Green Belt. The green belt separates that villages from Woking and Guildford, is essential to local wild life including some buzzards that now live in the fields behind Boughton Hall Avenue and we need the flood plains still to prevent flooding further down the river.

There is no need to be destroying our beautiful countryside and endangering ancient trees, local wildlife and the existing quality of life for current residents. Green Belt is Green Belt for a reason, please respect that.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/45  Respondent: 15081281 / Sabine Marke-Deleau  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to GBC having not followed the correct Process for the planning. They way you have changed the development plan is significant and required another full consultation under Regulation 18.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/34  Respondent: 15081281 / Sabine Marke-Deleau  Agent:
Green Belt, Policy 2 at paragraph 4.3.15

I object to the proposal to inset Send Business Park from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Clockbarn Nursery, Tannery Lane, Policy A42

I object to the Policy A42 change at Clockbarn in Tannery Lane because:

- The plans have increased from 45 homes to 60 homes which is 33% and this is too much
- It ignores all the hundred of previous objections made by local people
- It will increase problems with the traffic in Tannery Lane and at the A247 junction
- It will cause erosion of the Green Belt in our village
- It will increase surface water flooding, which is already a problem and is increasing with further development
- It will impact on the open countryside views from the River Wey Navigation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/353  Respondent: 15081281 / Sabine Marke-Deleau  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

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Page 1973 of 2855
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Garlik’s Arch, Send Marsh, Policy A43

I object to the Policy A43 change at Garlick’s Arch because:

• It ignores all the thousands of previous objections made by local people
• The is no proven demand for Travelling Showpeople plots in this location
• It is beautiful permanent Green Belt and no ‘exception circumstances’ exist
• It will cause overdevelopment of our village and the number of homes is excessive
• It is exquisite ancient woodland that existed at the time of Elizabeth 1
• It will join p Ripley and Send and defeat the key purpose of Green Belt
• It is subject to frequent flooding and is currently a flood zone 2 allocation
• It is contaminated by lead shot accumulated over 50 years
• It will generate excessive traffic that will block up the local roads of Send and Ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/354  Respondent: 15081281 / Sabine Marke-Deleau  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Burn Common, London Road, Policy A58

I object to Policy A58 at Burn Common because:

• It was deleted from the 2014 draft because of all the objections made previously
• The word ‘minimum’ is a change from the previous ‘maximum’ in the 2016 plan and since that time there has been a decline in the demand for industrial land
• There is no need to build industrial or warehouse developments in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
• The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt
• The impact on small surrounding roads will create traffic gridlock
• It will join up the existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECTION TO SEND HILL DEVELOPMENT ,POLICY A44, 1.9 LAND WEST OF WINDS RIDGE & SEND HILL. — late stage without any prior consultation

Dear Sirs

I object to the planning development to the Green Belt status being eroded away , from Send Village , Send Hill Site , It outrageous to put 40 houses and 2 travellers pitch sites ,this is a new site and was not included in the regulation 18 draft and not been consulted upon previously .

Send Hill is a quite very narrow single track lane , peaceful , within beautiful countryside , it is also in permeant Green Belt status , so is totally inappropriate to increase the traffic flow , the junction where it meets Potters Lane is very dangerous indeed,as you cannot see on coming traffic coming round the bend at all , and would cause many accidents.

There are any number of brown fill land site in the borough on which to build ,without destroying the precious Green Belt.

The infrastructure of the village cannot cope with the currant populations requirements , one cannot get a doctors appointment, the schools , traffic congestion etc ,are all under pressure .

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I strongly object to the above plan. This is so shocking in every words.

Council cynically pushed through this proposed plan at the last minute.

There is no justification to build 400 homes and some industrial space on this site.

This site has a particular conservation sensitivity since it is covered in ancient woodland.
This plan is new and was not included in the regulation 18 draft and has NOT been consulted upon previously. Please find below my home address and I want my comments to be seen by the inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/40  Respondent: 15081505 / Victoria Yadav  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the above propose plan to build 40 homes and two Travellers Pitches.

This site is NEW and was NOT included in the regulation 18 draft and has NOT consulted upon previously.

The development for housing is inappropriate due to its permanent GREEN BELT status and high quality Green Belt amenity within an area of beautiful countryside, which would be completely be spoilt by an development.

The subsoil of the existing site contains documented unsafe land fill waste which is currently vented.

The proposed to include two Travellers Pitches is inappropriate due to the very narrow width single track country road providing insufficient access to the site.

So with my above comments I would like to say I STURDILY OBJECT

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2359  Respondent: 15081505 / Victoria Yadav  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to removal of Brownfield site (A34) from the Plan

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to removal of Brownfield sites (A4) from the Plan

Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2358  Respondent: 15081505 / Victoria Yadav  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removal of Brownfield sites (A4) from the Plan

Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2355  Respondent: 15081505 / Victoria Yadav  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the extended development in the Green Belt (Policy P2, Site A43)

I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

I object to the allocation of 6 Traveling Showpeople sites in A34 Garlick’s Arch

The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlicks Arch as this
development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.

I object to the potential and ill-defined increase in housing allocation at A43 Garlick’s Arch

The potential of an increase from 400 houses at site A43 Garlick’s Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2356  Respondent: 15081505 / Victoria Yadav  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the unfair imbalance of the Plan across the borough.

With the removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan has become even more biased against the North East of the borough. Guildford Borough is over 100 square miles. Of the 11350 homes proposed in the Plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2357  Respondent: 15081505 / Victoria Yadav  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The inclusion of site A58 Burt Common, removes the need for A43 Garlick’s Arch)

GBC’s own reasons for including Garlick’s Arch A43 in the 2016 version were

1. The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm, ... (site allocation A25) [ than the Burnt Common site did ]"
2. The site [A43] provides the employment floorspace needed in the plan to help meet identified needs’’

Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (which are almost contiguous) are in the plan; therefore GBC are not following their own guidelines and objectives.

Since A58 Burnt Common is now in the Plan (2017) more than the “required” industrial space is available there, so there is no reason for Garlick’s Arch to be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2360   Respondent: 15081505 / Victoria Yadav   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal for a Waste Management Facility in Green Belt (A58)

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/794   Respondent: 15081505 / Victoria Yadav   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the hiding of development by “deferment” (A24, A25, A26, A43)

This version of the Plan has concealed some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects:
  i) to hide the number of housed actually being built (A24, A25, A26 – total of 1100 deferred, but still being built!), and
  ii) give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/338  Respondent: 15081569 / Gary Cable  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My final and total objection is the creation of the 4 way junction at Burnt Common which really seems to be the crux behind the 400 homes at Garlicks Arch and probably the eventual building of the 2000 homes at Wisley. The road infrastructure cannot cope with this - the A3 is congested EVERY morning as you approach the M25 leading to many cars using Ripley as a cut through - if traffic starts to be able to come off at Burnt Common plus the new homes this is going to lead to congestion the whole day on all the surrounding roads. Many of the roads cannot be improved to take more traffic, and whilst the councillors said the A247 has been earmarked for £1 million pounds investment over the next 10 years - he could not say what they would do with the money. No amount of money can help this road take more traffic - yet it is the only route from all these homes to the Woking Waterloo fast train to London.

I object totally to the new local plan - DONT DESTROY OUR VILLAGES

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/730  Respondent: 15081569 / Gary Cable  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
**Industrial developments are not needed and should be kept to the ideal site of Slyfield**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am a resident of Send Marsh and I recently attended a local meeting where the New Local Plan was discussed and some questions were put to 2 Guildford councillors involved in the creation of the local plan.

I came away from the meeting with numerous unanswered questions and the feeling that Guildford BC is determined to destroy the local Green Belt from Guildford right up to the M25 and with it the destruction of the lovely villages of Send, Ripley and beyond. I object to many aspects of the plan not the least of which:-

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<table>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

* The wholesale destruction of Green Belt including 2000 homes at Merrow and without doubt the 2000 homes at Wisley if the 4 way junction at Burnt Common goes ahead

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

* The number of homes is way too many (even more so now with Brexit) - Village infrastructure can only cope with small developments under 50 homes not 400 plus industrial.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/46  Respondent: 15081569 / Gary Cable  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

No I don't agree as I understand the need for homes has been well exaggerated by nearly double the amount mentioned in the SHMA 2015. I object to so many houses being built on green belt land

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/47  Respondent: 15081569 / Gary Cable  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

Again I believe the last minute changes to the local plan made by GBC means they have not followed correct process. I object to the significant changes made from April 2016 especially regarding the number of houses jumping from 185 to 485 as these should require another full consultation under regulation 18, not the short cut of Regulation 19 which GBC are trying to get away with.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I don't believe many parts of the new Local Plan are Sound especially all the last minute amendments.

I object to the development at Garlick's Arch for many reasons not the least of which this is Green Belt permanently protected by the NPPF which should prevent the merging of settlements. There is no need for 7000sq m of industrial development based on the latest Employment Land Needs Assessment 2015 where a reduction was shown. If there is a need logic would say add it to Slyfield.

The A3, Send and Ripley could not cope with additional traffic generated from 400 + homes plus industrial traffic in this area, it is already congested in rush hour leaving my home on the Send Marsh Estate to drive through Ripley and join the M25. The Portsmouth Road is still used as a "rat run" by A3 traffic leaving the A3 at Burnt Common only to rejoin after Ripley if the A3 is busy. This development can only turn this into a bigger nightmare.

The other land around Send being considered for homes and travellers pitches again were last minute amendments and again are on permanent Green Belt status. I moved from Guildford to this area as I wanted a Country feel to what may well be my final home and Send Marsh was a perfect location between Woking and Guildford where I am close enough for access to both but is still a beautiful countryside location. I object to this being spoilt by building on precious greenbelt!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: SQLP16/52</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

No the local plan has not followed a Duty to Cooperate for many of the reasons I have already stated, not the least of which are Last Minute amendments and also the ignoring of the latest Housing (SHMA 2015) and Employment Land needs (ELNA 2015).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: SQLP16/53</th>
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<tr>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

Policy P2 states Send should not be removed from the Green Belt - many parts of the local plan completely go against this policy and I object to any areas of this vulnerable bit of land being removed from the Green Belt. Send provides a wonderful countryside buffer between Woking and Guildford and this local plan would lead to the whole area eventually becoming an urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/46  Respondent: 15081729 / peter mccarthy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to these proposed changes as the current proposition is for over thirteen thousand additional houses to be built in the borough of Guildford which is considered enough to meet current projected growth in this area. In addition, this site was not included in the original regulation 18 draft and has not previously been consulted on and it is green belt permanently protected by NPPF which aims to prevent the merging of settlements. This site is covered by ancient woodland is of particular conservation interest. Also, the proposed industrial site development of 7000 sq m is simply not required. We have a recently built small office block on the Send road has just been converted to flats. This is an indication that further industrial buildings are not required in this area. Also, Send village already acts as a through road to Woking and any further building in this area would lead to gridlock and a reduction in life quality for the residents of this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/49  Respondent: 15081729 / peter mccarthy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object as this is a new site and was not included in the original regulation 18 draft and was not previously consulted upon. This area is permanent green belt status and is an area of natural beauty. Also, the road infrastructure can not be amended to cover the increase of 40 houses without major investment and disruption as it is a narrow single track country road. The subsoil of this site is documented to contain unsafe landfill waste which is currently vented.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/34  Respondent: 15081729 / peter mccarthy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object as i do not believe that removing Send from the green belt as it currently provides a buffer between Woking and Guildford and does not have the infrastructure to support any major house or industrial building works within it's boundaries. in addition, any further loss of open land will lead to a further loss of habitat to the current wildlife that surrounds this village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/51  Respondent: 15081729 / peter mccarthy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I object because the evidence that has been used to arrive at the proposed changes is based on GBC ELNA carried out in 2013. These have been shown to have been reduced over the last 3 years by up to 80%. In addition, the housing numbers have been exaggerated by including students in the population increase to amplify the number of new houses required. Currently in the Send/Ripley area the current infrastructure finds it difficult to support the current population. If this program goes ahead as currently set out it will result in grid-lock on our roads, the possible collapse of the local health services, schools being even more over crowded than present and the disappearance of both villages as separate entities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): (Yes)</td>
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<tr>
<td>I object that this has complied with current legislation as GBC appears to be pushing these changes through on regulation 19 hence by passing another full consultation required under regulation 18</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT. The plan acknowledges that the area lacks sufficient ground water supply yet continues to propose developments in Green Belt without due consideration for sustainable supplies of fresh water.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): (Yes)</td>
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</table>
I OBJECT on the basis that the GBC has not provided sound evidence of the ELNA 2015 which suggests that industrial space in Burnt Common is no longer required. I further OBJECT as the GBC has not followed the correct planning process in regard to the large scale road junction at Burnt Common. This proposal requires full public consultation under Regulation 18.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I OBJECT as the GBC has made significant changes to the plan without full public consultation which is contrary to Regulation 18 which invalidates the planning process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I OBJECT to villages being removed from the Green belt. Such villages provide a buffer to the urban developments of Guildford and Woking and importantly provide a valuable buffer against the traffic pollution and noise emanating from the M25 & A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43a</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A43: I OBJECT to the addition of 8 traveller sites as provision has already been made within the Send/Send Marsh area.

A43A: Given that site A58 has now been changed to a "Strategic Employment Site the proposed A3 slip road at this site is inappropriate and I continue to OBJECT as a more appropriate site would be adjacent to the proposed Send Business Park (site 14) which abuts an underused dual carriageway (London Road) and is opposite land used for a "car boot sale". Plus siting a slip road here would also serve the proposed "Godsden Hill" development. It seems that the bribe of free land outweighs common sense as should A43A go ahead the additional heavy vehicular traffic from site A58 would increase noise and air pollution in the area and will doubtless lead to legal challenge at considerable expense to the GBC. On these grounds I strongly OBJECT to site A43A and suggest consideration be given to a slip road being included within site 14.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/13  Respondent: 15082049 / Antony Marke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the evidence. GBC failed to provide acceptable evidence in the terms of the Employment Land Needs Assessment 2015. The industrial space at Burnt Common is no longer needed. The housing numbers from the SHMA are highly questionable. The number of foreign students has been wrongly used to inflate the need. The required 13,860 houses in the local plan is exaggerated and far too high. The Green Belt does not need to be built over and brownfield sites should be used. GBCs Transport Assessment was not even available to councillors for the vote taken on 24th May. Infrastructure overload has had little attention.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/12  Respondent: 15082049 / Antony Marke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy P2. Send should not be removed from the Green Belt. The green belt separates that villages from Woking and Guildford, is essential to local wild life including some buzzards that now live in the fields behind Boughton Hall Avenue and we need the flood plains still to prevent flooding further down the river.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPS16/44</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A43 30 ha Land at Garlicks Arch, Burnt Common, designated for 400 houses and 7,000 sq m of industrial and warehousing. There is no need for any more houses on top the 13,860 already proposed for the borough. This is Green Belt permanently protected by the NPPF which prevents the merging of settlements and there are no exceptional circumstances and the area has ancient woodland with trees from the 16th century. Our roads could not take the traffic and would cause long delays and possible frequent gridlocks.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID:</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A44. 1.9 ha Land west of Winds Ridge and Send hill being designated for 40 homes and 2 travellers pitches. This site is new and was not included in the regulation 18 draft and has not been consulted upon previously. Again, this is green belt and needs protecting. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is inappropriate due to the narrow width singe track country road providing insufficient access to the site and widening this would be destroying our countryside further.

There is no need to be destroying our beautiful countryside and endangering ancient trees, local wildlife and the existing quality of life for current residents. Green Belt is Green Belt for a reason, please respect that.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<tr>
<th>Comment ID: SQLP16/56</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to GBC having not followed the correct Process for the planning. The way you have changed the development plan is significant and required another full consultation under Regulation 18.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>Green Belt, Policy 2 at paragraph 4.3.15</td>
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<tr>
<td>I object to the proposal to inset Send Business Park from the Green Belt because:</td>
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<td>• It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation</td>
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<td>• There is highly restricted vehicular access along Tannery Lane in both directions</td>
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<td>• Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
Clockbarn Nursery, Tannery Lane, Policy A42

I object to the Policy A42 change at Clockbarn in Tannery Lane because:

- The plans have increased from 45 homes to 60 homes which is 33% and this is too much
- It ignores all the hundred of previous objections made by local people
- It will increase problems with the traffic in Tannery Lane and at the A247 junction
- It will cause erosion of the Green Belt in our village
- It will increase surface water flooding, which is already a problem and is increasing with further development
- It will impact on the open countryside views from the River Wey Navigation

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: pslp172/386</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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Land at Garlik’s Arch, Send Marsh, Policy A43

I object to the Policy A43 change at Garlick’s Arch because:

- It ignores all the thousands of previous objections made by local people
- The is no proven demand for Travelling Showpeople plots in this location
- It is beautiful permanent Green Belt and no ‘exception circumstances’ exist
- It will cause overdevelopment of our village and the number of homes is excessive
- It is exquisite ancient woodland that existed at the time of Elizabeth I
- It will join p Ripley and Send and defeat the key purpose of Green Belt
- It is subject to frequent flooding and is currently a flood zone 2 allocation
- It is contaminated by lead shot accumulated over 50 years
- It will generate excessive traffic that will block up the local roads of Send and Ripley

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: pslp172/387</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
Land at Burn Common, London Road, Policy A58

I object to Policy A58 at Burn Common because:

- It was deleted from the 2014 draft because of all the objections made previously
- The word ‘minimum’ is a change from the previous ‘maximum’ in the 2016 plan and since that time there has been a decline in the demand for industrial land
- There is no need to build industrial or warehouse developments in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt
- The impact on small surrounding roads will create traffic gridlock
- It will join up the existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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<tr>
<td>GBC have failed to provide evidence relating to Employment land needs assessment 2015 (ELNA) this shows a reduction in employment since 2013.</td>
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<tr>
<td>It would seem that incorrect numbers have been used to inflate the need for for housing.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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<tr>
<td>Policy P2 Send should not be removed from Green Belt as it provides a buffer between Woking and Guildford</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Page 1993 of 2855
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43.30 There simply is not thinned for more housing on top of the 13,860 already preposed for the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/58  Respondent: 15082721 / John Stack  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to comment on the above by saying I Object strongly against the preposed plan.

The reasons for my objection are as follows.

GBC did not follow the correct process and consultation period under regulation 18. Rather than the short cut that GBC are trying to use regulation 19.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/302  Respondent: 15083457 / David Stonebanks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ash and Tongham

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I wish to object to the plan for new homes in Ash on the land behind Ash Manor school.

There is not enough facility's in the area such as doctors, schools and main road links. The road network in the area is already sub standard and constantly having delays. The schools are already full.

It must not happen and I wish to register my objection

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/18  Respondent: 15083457 / David Stonebanks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The plan you have to build new home in Normandy is totally ridiculous.

There is no way Ash and the surrounding roads could cope with the extra traffic.

This is green belt land and should not be touched. Many people moved to that area knowing it was green belt and they wanted to live out of a town.

Please register my strong objection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/22  Respondent: 15083457 / David Stonebanks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I wish to object to the plan for further housing development in ash and tongham.

This is green belt land and should stay that way. On top of this there is not enough schools in the area to support this. The roads are all exceptionally busy and badly maintained.

The level crossing at ash station already causes massive traffic as do the traffic lights in Normady.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3863  Respondent: 15084545 / Andrew Wilton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Village expansion is unsustainable. With only one small shop, no post office, a very limited weekdays only bus service through the village, it is clearly unsustainable for the proposed high volumes of new housing development

- The development of 385 homes on the 4 proposed sites are at much higher densities than currently exist in the village settlement and will be totally out of character with the existing mix of different housing styles and layout of the village. The homes building proposals are unsustainable in terms of schooling, drainage, roads capacity, shops, parking in East Horsley (shops and station), public transport

- The need for so many houses to be built in West Horsley over the first 5 years of the Plan period 2018 to 2033 is totally unproven. The West Horsley Parish Council and Surrey Community Action Housing Survey: May 2014, identified a limited need for some 20 affordable homes for local people who want to remain in the village, i.e. for young people and for elderly people who wish downsize to a smaller home.

The exceptional circumstances require before taking action to remove the Horsleys from the green belt have not been demonstrated at all.

In conclusion I would as that you revise the housing number and amend the local plan to use brownfield land rather than our now dwindling green belt areas

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13267  Respondent: 15084545 / Andrew Wilton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Our Green Belt is precious to all of the residents within Horsley. It is what protects London from urban sprawl; it preserves air quality; it prevents flooding. It is for us to conserve and protect it. There are 5 legal purposes for Green Belt, and it meets them all:

- To check the unrestricted sprawl of large built up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

NO EXCEPTIONAL CIRCUMSTANCES

The local plan proposes additional housing stock to the area, 385 new homes being built in West Horsley (a 35% increase on the current housing number of 1,111) and an additional 148 homes proposed for East Horsley.

I am totally opposed to the village's removal from the Green Belt by insetting and extending the 2003 Local Plan Settlement Area boundaries.

Our local doctors surgery cannot cope now with the current resident numbers, with constant difficulty in making appointments.

The Raleigh school which serves both East and West Horsley is full every year and this has been the situation for many years. There is a continuing lack of state primary school places in the village.

Our local waste drainage, our water supply, our medical facilities and our roads cannot cope with the proposed number of new homes. Building this number of homes will lead to further flood risk here and downstream. The planned development on Green Belt is therefore unsustainable.

In conclusion, I must ask you to revise the housing number, and to amend the Local Plan to utilise brownfield land rather than green field sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy S2 states that provision will be made for 13,800 new homes over the Plan Period 2013 to 2033. The number of homes is too high and unsustainable in Guildford’s villages. The Site Allocations list totals 12,698.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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5 DEFINITIONS AND SOURCES

5.1 To review a local plan from a standing start is a big task and has required a lot of reading and detailed research. Along the way I have come across well informed opinion from individuals and organisations and I make no apology for including what I believe are correct and clearly expressed statements regarding the wide ranging issues to hand. I would therefore like to give thanks to others for their valuable contributions. However, I have of course referenced all statements made by retained consultants by GRA and CPRE e.g. NMSS and Green Balance.

5.2 NMSS is a consultancy company specialising in housing demographics whose principal is Neil McDonald

5.3 Green Balance is a consultancy company specialising in housing demographics whose principal is Richard Bate

5.4 On matters of road infrastructure, I have relied on comments by Richard Jarvis of the GRA who was previously a highways consultant with WS Atkins

5.5 On matters of property research, development, planning and valuation I have relied on my own skills and experience as a former Chartered Surveyor and Management Consultant specialising in property strategy and research in the public and private sectors. I have also used some material from my review of the Town Centre Masterplan 2015 which I reviewed for the Guildford Greenbelt Group and which can be found on their website.

5.6 References to “local plan” are intended not to be the previous 2003 Local Plan but to be references to the current Regulation 19 draft local plan prepared by Guildford Borough Council.

5.7 GBC refers to Guildford Borough Council

5.8 SHMA refers to the Strategic Housing Market Assessment 2015 prepared by GL Hearn

5.9 OAN refers to the Objectively Assessed Need in relation to housing

5.10 NPPF refers to the National Planning Policy Framework

5.11 CPRE refers to the Campaign for the Preservation of Rural England

5.12 GRA refers to the Guildford Residents Association which comprises over 25 Residents Associations and five Parish Councils
5.13 SSAG refers to the Save Send Action Group which comprises over 500 residents
5.14 ELNA refers to the Employment Land Needs Assessment 2015
5.15 NPPF refers to the National Planning Policy Framework
5.16 NPPG refers to the National Planning Policy Guidance
5.17 VoA refers to the Valuation Office Agency

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1201  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? () is Sound? () is Legally Compliant? ()

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. EVIDENCE BASE

2.1 I object to the paucity of the evidence base. The submission documents are unsound, unreliable and inconsistent

2.2 Key parts of the evidence base are flawed or based on withheld assumptions.

2.3 The current SHMA inflates the proposed housing figure due to the following factors: the failure to correct for errors in the historical data for international migration flows; the way it considers students and affordability, and the flaws in the method for estimating the number of homes needed to support job growth; the treatment of vacant property

2.4 The Green Belt and Countryside Study does not value the fundamental aim of Metropolitan Green Belt properly or look strategically at options for development in major settlements beyond. The way Green Belt is parcelled up and scored is not valid: serving 2 Green Belt functions is as valid as serving 4 functions. Green Belt is Green Belt, it does not require assessment or qualification. The Green Belt sensitivity analysis is not a valid basis for informing decisions.

2.5 Exceptional circumstances clearly do not exist to justify amendments to Green Belt boundaries as part of the Local Plan process. It is quite achievable for realistically prepared and identified development needs to be accommodated in Guildford’s urban areas and villages.

2.6 The Transport Evidence has been produced very late and is incomplete, inaccurate and untested to the extent that the Plan is not ready for a Regulation 19 consultation.

2.7 It is emerging that the Strategic Highway Assessment shows there will be congestion, even with all the highway schemes in the Plan. Many questions remain unanswered. E.g. Why would 1000 homes on Slyfield generate no extra traffic? The report only gives average speeds and information needed to understand how much congestion will occur and where it has not been provided in time to inform Plan proposals or responses.

2.8 The available evidence suggests much of the proposed Sustainable Movement Corridor cannot be delivered due to narrow roads and pinch points.
2.9 Evidence on bus travel is fundamentally compromised because no clear and workable location for a bus interchange is proposed.

2.10 No information has been provided on the demand for and capacity of rail services. The main line to London is already extremely busy in peak periods.

2.11 Information about the town centre as regards traffic, buses and parking is lacking. It is not credible to proceed without this given existing levels of congestion, the number of transport routes that rely on the town centre to cross the Downs, the shortage of crossing points over the railway and river and the fact that narrow roads and steep slopes make Guildford unsuitable for a ring road approach.

2.12 The Strategic Highway Assessment 2016 is flawed. It is invalid to base this on less traffic growth than the proposed housing growth. The report points to overcapacity use of the A3, M25, A31, A320, Millbrook, Ladymead, Woodbridge Road, York Road, London Road but understates the congestion consequences. Various suggested queue reductions are unexplained. The consequences of major proposed reductions in road space in the town centre (eg closure of Walnut Tree Close, narrowing of Woodbridge Road, reduced capacity of the gyratory) and of developing Burnt Common are not included. More time is needed to assess and refine this crucial 11th hour report which seems incomplete, understates the consequences of traffic overload, shows inconsistencies, and does not supply assumptions or information needed to understand queues at junctions.

2.13 The Guildford Retail Study Update lacks credibility and there is no proven case for expanding comparison retail space which is undermined by failure to implement existing retail consents at the North Street development over the last 10 years. The Guildford Retail Study does not take account of changing retail patters in relation to the threat of the internet and the “clicks and mortar” conflict. The study also assumes a number of logged retail requirements from companies already in liquidation or with national requirements that exclude Guildford.

2.14 I believe that it was unacceptable to stop monitoring air quality, where NO2 emissions exceed limits, on the unrealistic assumption congestion would reduce. Estimates of premature deaths have doubled and issues with vehicle emission controls have emerged. Traffic noise from the A3 should also be reported.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2211  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

38 POLICY A25 GOSDEN HILL

38.1 I object to policy A25 Gosden Hill

38.2 There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
38.3 Gosden Hill is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt.

38.4 The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity.

38.5 The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

38.6 The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

38.7 I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).

38.8 The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

38.9 A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2212  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

39 POLICY A26 BLACKWELL FARM

39.1 I object to policy A26 Blackwell Farm

39.2 There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

39.3 Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of green belt, and fulfils purposes 1, 3 and 5 very strongly.
39.3.1 Purpose 1 - “checking the unrestricted sprawl of large built-up areas”. There is huge pressure to develop on the western edge of Guildford; the University of Surrey has stated publicly that its key objective is to develop the whole of its landholdings, stretching west to Flexford Farm. This, combined with the indefensible boundary being proposed (a hedgerow rather than the existing belt of ancient woodland), will put more of the green belt and the Surrey Hills Area of Outstanding Natural Beauty (AONB) at risk of future development.

39.3.2 Purpose 3 “assists in safeguarding the countryside from encroachment” - the proposed movement of the green belt boundary on the west of Guildford to allow for development of the University in 2004 resulted in the encroachment on countryside and the loss of working farmland (including some Grade 2) at Manor Farm. The proposed future change in the boundary would result in further encroachment and the loss of farmland including further Grade 2. The proposed road development with access road from the A31 would also effectively cut off farm access to the south of the development area leading to further urban influence on this countryside. The University’s stated key objective is to develop land which includes Chalkpit and Wildfield farms leading to the risk of further boundary change and further encroachment in future years.

39.3.3 Purpose 5 - “assists in urban regeneration by encouraging the recycling of derelict and other urban land”

39.4 Whilst all green belt assists towards this purpose, the ownership of this land by the University of Surrey with its extensive landholdings within the urban boundary (including land it leases to the Hospital and Holiday Inn, the Surrey Research Park, Hazel Farm as well as two large campuses) means that the location of Blackwell Farm within the green belt plays an even greater and direct role in encouraging the more efficient usage of urban land.

39.5 Stopping development on Blackwell Farm would result in the University of Surrey investing in, and regenerating, land in its ownership and delivering its commitments following the 2003 boundary review (including 270 homes for key workers, 3,125 student residences and releasing further accommodation at Hazel Farm). The University has 17 hectares of surface car parking that could be built over with offices and flats. This is a more sustainable option than building over open farmland (largely grade 2 and 3a) within the green belt.

39.6 The Blackwell Farm development would result in harm to the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the setting to the AONB. (Blackwell Farm forms the views into and out of the Hogs Back ridge). The NPPF is clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. All development proposals within and adjacent to the AONB must conserve or enhance its special qualities. The NPPF also makes it clear that applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public’s interest. Guildford Borough Council has not shown that the proposed housing development or the extension of the Research Park, or the proposed link road from the A31 to Gill Avenue, is in the wider public interest. Indeed, the increased traffic through the already congested Egerton Road/Gill Avenue junction, which would result from the development, would impede emergency vehicles travelling to the Hospital and this would be very much against public interest. GBC’s Policy P1 states that, “The Surrey Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development. All proposals will be considered against whether they conserve and/or enhance the setting and views of the AONB”. I question how the proposal to carve a new two-lane carriageway through the AONB fits this policy, or meets para 115 of the NPPF? Finally, nearly the whole site has been identified as a “candidate area” for AONB status in the Landscape Evaluation Study commissioned by Compton, Worplesdon and Wanborough parish councils. Therefore, the entire site should be treated as though it is within the AONB during this local planning process.

39.7 The access to the proposed Blackwell Farm site will put additional peak hour pressure on two of Guildford’s worst congestion “hot spots”: the A31 (Hog’s Back) and the Tesco Roundabout on Gill Avenue.

39.8 GBC’s proposal to create a new major route into Guildford from the west at, or close to, the Down Place private driveway, and to make this the main access to the planned Blackwell Farm development, does not appear to have been thought through. There are queues stretching back from the Farnham Road Bridge as far as the Down Place driveway entrance most weekday mornings and any traffic generated by the new development would not be able to clear the junction. In order to accommodate the volume of traffic using the new junction (generated by residents of the new housing estate, employees at the Surrey Research Park, Hospital and University, and visitors to the new school/supermarket), there would
almost certainly need to be a roundabout (rather than the proposed traffic-light controlled junction) and GBC has ruled out a roundabout on grounds of landscape impact and traffic.

39.9 The secondary access to the site at Gill Avenue also presents problems, and as GBC states in its Transport Assessment (14.9.5), changes planned for the Tesco roundabout will not mitigate against the increased level of traffic through the junction as a result of the Blackwell Farm development, and this in turn will impact on the Egerton Road/Gill Avenue junction, which serves the Royal Surrey County Hospital. I question whether it is responsible to allow a development that would impede emergency access to an A&E department and a major incident unit.

39.10 The traffic impact resulting from the development of Blackwell Farm on the strategic road network would not appear to be properly assessed but it would be alleviated in part (but not completely) by widening the A3. However, timing and funding for this work is unclear so there would be many years of traffic chaos before any widening took place (if indeed it does). More significantly, the widening of the A3 would create noise and environmental impact on the neighbouring residential areas of Onslow Village and Beechcroft Drive and a six-lane highway would cause greater severance between Guildford and Blackwell Farm and areas to the west.

39.11 The NPPF states in Section 6 para 47 that local authorities should “identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15”. In a footnote to this, it further adds, “To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.” I consider that the proposed access arrangements to Blackwell Farm are wholly inadequate for a development of this scale and thus the site cannot be “viably developed”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2213  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

40 POLICY A35 WISLEY

40.1 I object to Policy A35 Wisley

40.2 I object to the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers to try again.

40.3 There is in any case no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

40.4 This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected.
Residents are disturbed by apparent political links between the ruling Conservative group on the Council and individuals connected to the developers, a shadowy Cayman Islands company.

40.5 Policy A35 should be deleted from the plan for all the reasons the development was rejected by the Planning Committee, including:

1. Green Belt location and absence of “exceptional circumstances”.

2. Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.

3. Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).


5. Absence of adequate traffic data.

6. Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.

7. Loss of high-quality agricultural land (55% of the site), in breach of national policy.

8. Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.


10. Cost of infrastructure required to the detriment of alternative more favourable sites.

11. Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.


13. Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.


15. Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.

16. Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).

17. Failure to evaluate the cumulative impact of this and nearby development sites on the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 15084897 / Save Send Action Group (Andrew Procter)</th>
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<th>41</th>
<th>POLICY A42 CLOCKBARN NURSERY</th>
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<tbody>
<tr>
<td>41.1 I object to policy A42 Clockbarn Nursery</td>
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<tr>
<td>41.2 There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.</td>
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<tr>
<td>41.3 The site is part of the permanent Green Belt at Send and should remain undeveloped in order to preserve the amenity of the surrounding area.</td>
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<td>41.4 The site has very restricted access along Tannery Lane which is narrow and for most its length only capable of providing access for cars in one direction. Development of the site is not therefore sustainable or practical.</td>
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<tr>
<td>41.5 Tannery Lane already provides access to a Business Park which generates a considerable amount of traffic at all times of the day including lorries. This narrow country lane cannot cope with any more traffic.</td>
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<td>41.6 Planning consent has already been granted, rather unwisely given the access problems, for 84 flats and a marina. Anymore development at this location would not be sustainable.</td>
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<td>41.7 The junction with Send Road has poor visibility and is dangerous for traffic entering and leaving Tannery Lane.</td>
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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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<th>42</th>
<th>POLICY A43 GARLICKS ARCH</th>
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<tr>
<td>42.1 I object to policy A43 Garlick’s Arch</td>
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<tr>
<td>42.2 There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.</td>
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<td>42.3 The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.</td>
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<tr>
<td>42.4 Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be</td>
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reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

42.5 The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

42.6 I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in Send, Ripley and Clandon will result in the character of these villages being lost and the countryside encroached.

42.7 I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

42.8 I object to the proposal to build 7,000 sq m of light industrial, general industrial or warehousing on the site at Garlick’s Arch. There is no need to place a Strategic Employment Site in this location when there is plenty of spare space available at Slyfield (40 ha). The Employment Land Needs Assessment (ELNA) 2015 has been reduced by 80% since the ELNA 2013. There is no longer any need to place industrial development in the Green Belt when there are plenty of brownfield sites available.

42.9 I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

42.10 I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

42.11 I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

42.12 Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

42.13 Many of the affected villages, such as Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

42.14 With some 5000 houses being proposed close to the village of Send and Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.
42.15 The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

42.16 I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

42.17 Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

42.18 Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

42.19 Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

42.20 Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

4.21 I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

4.22 I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

4.23 I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

4.24 It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

43 POLICY A43a BURNT COMMON

43.1 I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a). The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

43.2 The route from London/M25 to Woking would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

43.3 I object to the proposed Infrastructure Schedule (Appendix C). The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

44 POLICY A44 SEND HILL

44.1 I object to policy A44 Send Hill

44.2 There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

44.3 The proposed development is not sustainable because of poor infrastructure. Send Hill is a single track country road and too narrow to provide sufficient access to the site for travellers or accommodate the potential new levels of traffic the proposed development would bring.

44.4 The site is a high quality green belt amenity area within beautiful surrounding countryside and would be spoilt by the development.

44.5 A Wasteland Solutions environmental report on Send Hill dated March 2004 gave evidence of past ponding of water in the excavated area. Further development would disturb the water table and increase risk of flooding to surrounding properties.
44.6 The site was used as a GBC registered landfill site and shown on the 1963-8 Ordnance Survey maps as “refuse and slag heap”. It is therefore unsuitable for such a development on health reasons.

44.7 On the 1971 Ordnance Survey the site is shown as a “refuse tip” prior to when proper licensing/registration was required. The date of the landfill works predates the 1999 EU Landfill Directive regulations. I therefore believe that there is a danger that any disturbance would be health hazard due to the unknown materials.

44.8 GBC has installed gas monitoring wells on site since July 2000. One well recording methane gas discharge.

44.9 A Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005-Identifies the proposed site as GBC recorded landfill site Ref GU/11/LLC with type of waste not identified. The date of the landfill works predates the 1999 EU Landfill Directive regulations. I therefore believe that there is a danger that any disturbance would be health hazard due to the unknown materials.

44.10 A Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005-Identifies proposed site GBC recorded landfill site Ref GU/12 with type of waste identified as “unrestricted”. This causes concern as to what it does contain and the dangers if disturbed.

44.11 An Envirosearch Report RS1100201_1_1 dated 17th February 2004 and historical map data and information from GBC has identified the site as landfill and has “areas of potentially contaminative industrial activities” and “potential risk from landfill gas migrations”. Development of this site would be a health hazard.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2218  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

45 POLICY A46 LAND TO THE SOUTH OF NORMANDY

45.1 I object to policy A46 land to the south of Normandy

45.2 There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints

45.3 There is unproven demand for secondary school places in the west wards that is being proposed as "exceptional circumstances" to redraw the Green Belt boundary. There is strong research evidence from SCC Education which proves existing under-utilisation in long term of secondary places in the west of the borough.

45.4 There is an incorrect calculation of bespoke SANG since only 10 ha are proposed within site but the new population requires 21 ha. This will impact viability if contained in site (65 ha approx) - there is not an additional 10 ha in currently proposed SANG pre-allocated schedule in infrastructure report (Russell Place Farm)

45.5 There is an incorrect evaluation of contribution of land within and between settlements to Green Belt "openness" -the previous PINS decisions in three appeals asserts "openness". GBC state there is no "openness" yet all land parcels in the site are 'red' sensitivity in GBCS Vol 2 Addendum 1 & 2 and all contribute to the 3 key purposes of the Green Belt.
45.6 There is a failure to engage with Rushmoor under the duty to co-operate rules in regards of traffic impact from Aldershot Urban Extension (3,800 homes) The increased commuting to Guildford plus new local vehicles (1,375 estimated) will take the A323 to over design capacity and produce perpetual congestion.

45.7 The one railway bridge in Glaziers Lane + 1 railway tunnel in Westwood Lane on North Downs line are restricted (tunnel single lane) with poor geometry and have poor safety records with one fatality in last 15 years and there is no plan in the infrastructure report to widen bridge or replace tunnel (Network Rail). This will lock traffic from new development within site to the north of Flexford. C and D class roads are not designed for volumes indicated in Scenario 5.

45.8 The flood risk will be significantly increased when land is developed. The site lies on the Hogs Back spring line and the land is natural SuDS. There is a stream running through the site with flood risk 3a. Civil engineering mitigation is unlikely to be effective.

45.9 The site will introduce 300+ dogs and 250+ cats within 1km of TBHSPA and SANG will not stop increased disturbance and predation on the SPA.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4773  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

27 POLICY D1 MAKING BETTER PLACES

27.1 I object to Policy D1 Making better places

27.2 I object to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force.

27.3 The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4776  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

28 POLICY D2 SUSTAINABLE DESIGN

28.1 I object to Policy D2 Sustainable design, construction and energy

28.2 Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1, not buried away as a minor detail in Policy D2.

28.3 This policy amounts to “greenwashing”, expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital, especially the countryside, from futile attempts to rig the housing market.

28.4 This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is meaningless, since no such networks are available locally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4780  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

29 POLICY D3 HISTORIC ENVIRONMENT

29.1 I object to policy D3 Historic Environment

29.2 This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to “support development” that might “enhance” heritage assets leaves wide scope for abuse in the form of destructive commercialisation and financial leveraging of relevant sites.

29.3 This policy is based on the false premise that Guildford’s heritage is inherently in decay. This is a developer’s charter – a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council’s aggressive reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the “reasoned justification”, the actual policy wording in the blue box leaves too many loopholes.
29.4 Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4782  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

30 POLICY D4 DEVELOPMENT IN URBAN AREAS

30.1 I object to policy D4 Development in urban areas and inset villages

30.2 This policy that does not address the opportunity for building in the urban area

30.3 The plan envisages that 40% of homes built will be “affordable”, but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called “affordable” homes or pay an “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand).

30.4 The number of homes planned in the urban area is much too low. There is a glaring need for regeneration in many urban areas, particularly Guildford Town Centre but this is ignored in favour of building homes on green-field sites instead.

30.5 This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure.

30.6 The plan envisages a large expansion of the retail sector, but this is a sad voice from the past because the sector is in rapid and continuous decline.

30.7 All the stated policy aims for “inset” villages will be negated by the excessive weight of new housing development proposed which would radically change their character forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4783  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

31 THE BROWNFIELD OPPORTUNITY

31.1 Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. **But first** we must make 100% use of our urban brownfield before we consider building in the Green Belt or countryside.

31.2 Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy that states clearly. “We are committed to a brownfield first initiative whereby all applications on previously developed land are given fast track priority and every facility to promote development for residential purposes and employment purposes in order to satisfy the needs of local people. In parallel a zero CIL incentive should be given for all residential development on brownfield land.

31.3 In response to the detailed objections received in the Regulation 18 process of the 2014 Local Plan and also in accordance with government policy a Guildford brownfield land register should be urgently compiled showing address, ownership, occupier, current use and detailed planning brief.

31.4 A head of brownfield should be appointed at GBC with a clear briefing to deliver brownfield targets of housing and employment space.

31.5 GBC needs to accelerate the residential redevelopment at Woodbridge Meadows, Walnut Tree Close and the Station within the next 5 years.

31.6 GBC needs to examine the residential development opportunity of the 25.7 acres of car parks in GBC ownership.

31.7 I do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact.

31.8 The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. The reality is that the Town Centre has the capacity for at least 5,000 homes.

31.9 The additional target capacity of 5,000 could easily be provided within the following urban sites which have the capacity for 7,500 homes:

- 2,500 homes detailed in Masterplan 2015 including Woodbridge Meadows which can itself be increased substantially
- 500 homes at North Street
- 1000 homes on current GBC car parks (25 acres) and at the station
- 1000 homes saved in the urban area if 100% of students are accommodated on Surrey University campus (17 ha of car parks)
- 1000 homes at Slyfield on the 40 ha regeneration site
- 1000 windfall infill (50 per annum)
- 500 homes on brownfield sites in villages on sites of max 1ha which do not impact Green Belt
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/4757 **Respondent:** 15084897 / Save Send Action Group (Andrew Procter) **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

17 **OLICY E1 SUSTAINABLE EMPLOYMENT**

17.1 **I object** to policy E1 sustainable employment

17.2 I note that there is a significant reduction of between 71% and 79% in the previous job target and resultant 79% reduction in employment space in response to the many objections lodged in 2014 against an unsubstantiated agenda for economic expansion in the last draft and based on new findings by Aecom in the latest ELNA 2015.

17.3 I have concern as to the ill-informed clustering of all B classes in terms of the clarity of market evidence required to inform effective planning and a failure to provide a clear understanding of business needs required under Section 160 of the NPPF.

17.4 I also note the dramatic reduction in assessed demand by two Employment Land Needs Assessment Reports carried out under the same terms of reference within a period of 2 years which calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC. I do not support the policy of creating a Strategic Employment site at Garlick’s Arch (A43) in the Green Belt which is completely unnecessary due to the overall decrease in demand for industrial space which could be easily accommodated at Slyfield.

17.5 I am concerned however that the research undertaken by Aecom is generally superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

17.6 No proper analysis has been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area.

17.7 GBC appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of useful property market research or forward planning.

17.8 What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8.

17.9 The lack of appreciation by GBC as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good
planning put forward in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below).

17.10 Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan.

17.11 Little regard is had to the opportunity of B1 b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub.

17.12 I note that the past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 derived from VoA analysis and that the calculated annual floor space demand is 0.7% over the plan period up to 2033.

17.13 I support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires.

17.14 We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So I should target high added value small and medium sized enterprises rather than the headquarters of larger corporations.

17.15 We need to promote the idea of new knowledge transfer in incubator units and small premises for new start up enterprises. They need to be on the wave of innovative new technology as opposed to older established businesses.

17.16 I object to the policy of creating a Strategic Employment at Garlicks Arch (A43) in the Green Belt. The stated requirement of 7,000 sq m (B1c, B2 and B8) could easily be accommodated at the Slyfield Regeneration site of 40 ha.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPP16/4759</th>
<th>Respondent:</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

18 POLICY E2: LOCATION OF EMPLOYMENT FLOORSPACE

18.1 I object to policy E2 location for new employment floor space

18.2 I am of the opinion that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre.

18.3 I object to the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt

18.4 The Surrey Research Park currently extends to 65,000 sq m. There is already granted consent to expand to a further 9,000 sq m (14%)
18.5 The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis.

18.6 The ELNA 2015 calculated annual floor space demand is 0.7%.

18.7 The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period. The necessary growth in floor space over the plan period is therefore 17 years x 0.7% = 11.9%.

18.8 There is currently **14% expansion space** already available.

18.9 The proposal by GBC to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required.

18.10 The Research Park is currently developed at a density of 25% plot ratio. The majority of existing buildings are 2 stories giving a developed floor space plot ratio of 12.5%.

18.11 The existing Research Park has the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing densities of existing academic buildings on the university campus which are three to four times higher.

18.12 Together with the existing expansion of 14% through existing consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university.

18.13 I do not accept that the valuable and workable concept of the Research Park should have its integrity and purpose diluted by being converted into yet another Business Park for office users rather than research organisations.

18.14 A preferred location for increased B1a and B1b space should be in the Town Centre close to housing and a convenient transport hub.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Many office buildings reaching an age of more than 30/50 years become redundant in terms of energy compliance making them illegal to occupy for employment purposes and the cost of refurbishment makes them redundant and uneconomic.

The reality of market demand is that the gross development value of refurbished residential space is in excess of the gross development value of refurbished old office space in many locations (this gross development value assessment is supported by the analysis by property consultants GVA in the supporting evidence within the Allies and Morrison Masterplan for Guildford dated 2015).

To resist change from B1a to C3 is contrary to the concept of brownfield first for residential development schemes.

To resist change from B1a to C3 in Strategic or Significant Employment Sites is contrary to the concept of integrated mixed use communities whereby the journey to work is minimised.

London has led the way with significant residential schemes being created from redundant office stock. A good example is the South Bank in London adjacent to Waterloo Station where in 2005 the Shell Centre has been converted into flats. Another early example is the 2000 scheme at Metro Central Heights at Elephant and Castle where the old Alexander Fleming House was converted to 435 flats by St George. GBC needs to adopt more modern trends and policies.

Guildford is in dire need of increasing town centre residential development.

The feared loss of employment will be marginal and impractical to resist. Empty office blocks are not the answer.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/4761  **Respondent:** 15084897 / Save Send Action Group (Andrew Procter)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

20 POLICY E4: SURREY RESEARCH PARK

20.1 **I object** to policy E4 Surrey research Park.

20.2 I support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. **I object** however to the completely unnecessary expansion of the Research Park into a larger Business Park. I believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University.

20.3 I believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. **I object** to the inclusion of B1c uses which is inappropriate and unnecessary.
20.4 Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise.

20.5 There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user.

20.6 Research parks that lose their way stop being the location of choice for new innovative enterprises.

20.7 The Surrey Research Park in Guildford needs to be focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing.

20.8 Monitoring indicators should include new start-ups and new patents created.

20.9 Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments.

20.10 I support the idea of a variety of sizes of unit including some small units (between 15 – 80 sq m) bearing in mind one workstation is 10 sq m.

20.11 Consideration should be given to the concept of shared “enterprise hubs” where individuals can take pay as you go workstations in shared spaces similar to touch down business centres similar to the “enterprise village” concept.

20.12 I object to the policy of any new extension of the research park more than the existing 14% already provided for within the park or within the footprint of the park.

20.13 The Surrey Research Park currently extends to 65,000 sq m.

20.14 There is already granted consent to expand to a further 9,000 sq m (14%) This space has been available for 10 years and is still to find a taker.

20.15 The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis.

20.16 The ELNA 2015 calculated annual floor space demand is 0.7%.

20.17 The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period.

20.18 The necessary growth in floor space over the plan period is therefore 17 years x 0.7 = 12% which is less than the current expansion space of 14%.

20.19 The research park is developed at a plot ratio of 25%. This could be increased to 50% within the same footprint of the existing park without damage to its amenity. The actual current land use for development in the park is in fact only 12.5% because most buildings are 2-storey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4764  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

21 POLICY E5 RURAL ECONOMY

21.1 I object to policy E5 Rural Economy

21.2 In my opinion this policy should only apply to small-scale development in rural areas which means development of less than 100 sq m (gross) which is in keeping with and the permanence and amenity of the green belt.

21.3 Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism that require local people to be consulted and heeded, not ignored. Villages need protecting in terms of both design and scale.

21.4 Most of the economic activities listed in 4.4.44 depend on maintaining the rural character of our villages which would be endangered by the wholesale “insetting”, boundary expansion and house building proposed in other parts of the plan. This applies also to new and projected enterprises in the Green Belt (e.g. Grange Park Opera’s Theatre in the Woods in West Horsley, which requires a protected, rustic setting to be a success, not housing estates and congested roads). Policy E5 is incompatible with the high housing numbers proposed.

21.5 Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This disregards the responses from the 2014 public consultation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4766  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

22 POLICY E6 LEISURE AND VISITOR EXPERIENCE

22.1 I object to policy E6 the leisure and visitor experience.

22.2 I believe that the importance of a visitor attraction hub could be much better articulated. Guildford has great potential to become a “must see” destination for tourists and visitors. Surrounded by the natural beauty of the Surrey Hills, it is already distinguished as an historic county town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back. Guildford would be wise to model itself on other historic towns like Bath, Chester and York.
22.3 The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town. Given the local and wider catchment of the town Guildford should strive for high quality definition making it a great centre for people to live in and visit. It would be a great mistake if Guildford were to opt for large impersonal department stores and dull high street chain stores at the expense of exploiting its uniqueness and character which would afford greater benefits.

22.4 Guildford the historic “Gateway to the Surrey Hills” has far more potential than Guildford just any other stereotypical centre found anywhere around London. What GBC needs to do is create a theme such as a new “Pilgrims Trail” similar to the Patriots trail in Boston USA with marked yellow footsteps leading from the station to the River and up through the historic heart of the town.

22.5 There is a need to make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

22.6 There is a need to help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to RHS Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently bypass Guildford to go to Bath, Oxford or Cambridge instead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4770   Respondent: 15084897 / Save Send Action Group (Andrew Procter)   Agent:   

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

23 POLICY E7 TOWN CENTRE

23.1 I object to Policy E7 Guildford Town Centre

23.2 I am of the opinion that policy E7 is ill-informed and there is insufficient evidential support to objectively assess the capacity of the existing town centre to accommodate appropriate new development and therefore fails the requirements of Section 161 of the NPPF to assess the real quantitative and qualitative floor space needs.

23.3 Policy E7 is an aspirational voice from the past and is unlikely to benefit the health of the town centre in the future. There is no reliable evidence provided that the retail core of the Town Centre needs or can be expanded by 45,000 sq m of retail space at North Street because of lack of demand for retail units in the Town Centre particularly large units. This is due to falling demand for retail space in Guildford and town centres throughout the country evidenced by independent research and the reality of empty shops in many high streets (including Guildford) and the accelerating competition from internet shopping.

23.4 The failure of the North Street scheme to be redeveloped over the last ten years is a testament to lack of demand which has been so poor that the original planning permission for a large retail scheme became time expired.
23.5 The reality is that the town centre has enough retail floor space. If more is introduced it will result in the closure of existing shops particularly in locations which are less than 50% of peak Zone A or 100% positions. What Guildford needs is a new focus on speciality high quality comparison shopping supported by a revival of Guildford’s attractive heritage core and a new major visitor attraction supported by restaurants. Guildford needs to become the quality shopping destination for Surrey.

23.6 The existing site in North Street should be replaced with a well-designed ground floor high quality speciality retail mall and frontage of no more than 40 shops extending to 7,000 sq m with the rear and upper floors providing an additional 500 to 600 homes. The proportion of the above proposed smaller scheme at North Street will be complementary to and not antagonistic to the Upper High Street, Tunsgate, the Debenhams site and the 100% Zone A positions of the Lower High Street. If the existing policy under E7 is adopted the North Street site will remain empty for another 10 years.

23.7 The findings of the Guildford Retail and Leisure Study 25 September 2015 are very pessimistic about retail trends. Carter Jonas’s recent retail study reports a fairly bad time for retail, the bullets below are direct quotes from the report:

1. Para 3.3 Retail Trends “Town centres, once the principle focus for retail and leisure are now increasingly under threat”

2. Para 3.4 Retail Expenditure “disposable income and retailers’ margins are being squeezed further”

3. Para 3.5 “there has been limited growth in retail (convenience and comparison goods) expenditure per head since 2008”

4. Para 3.6 “the retail sector remains fragile and analysts forecast that some operators and centres will continue to struggle over the short to medium term”

5. Para 3.8 “completed new shopping centre floor space in the UK is currently at its lowest level since the 1990s”

6. Para 3.11 Internet Shopping “New forms of retailing have also emerged in recent years and are becoming established as significant alternatives to more traditional ‘bricks and mortar’ shopping facilities. Over the last 5 years, online sales have increased by 222%”

23.8 Despite the findings about retail we are told “evidence suggests that high quality schemes will continue to prosper.” What evidence?

23.9 Para 3.33 “the latest 2013-14 Javelin VenueScore17 ranks Guildford Town Centre within the UK’s top 50 shopping locations at 33. By contrast, Kingston-Upon-Thames is ranked 17th. Since 2007, Guildford Town Centre has fallen 20 places in the Venue Score ranking”

23.10 Para 3.40 “The growth of online shopping is also impacting on the vitality and viability of many of Britain’s centres and high streets. This is placing pressures on rental growth and market demand in many centres, particularly secondary centres outside the ‘top 100’ shopping locations. This has been further compounded by rising vacancy levels and the loss of key retailers. As a result, the share of non-food retail sales conducted through town centre shops has declined, from 64% in 2002 to just over 40% by 2013. In our opinion, a far more uncertain future awaits the next “wave” of new retail investment and development. The evidence suggests that high quality schemes in the strongest prime shopping locations will continue to prosper.” Is this not an aspirational assumption?

23.11 Para 3.41 “Notwithstanding the threat of online shopping, industry experts still predict that the demand from major retailers for new space will continue as it remains the primary mechanism for retailers to ‘reach’ their customers and grow their businesses.” Who are these industry experts? Is this not an outdated concept and merely an aspiration of the British Council of Shopping Centres (BCSC)?

23.12 Appendix 6 of the Retail Study indicates potentially inaccurate demand data

23.13 Para 5.29 “The latest CoStar Report recorded 64 requirements for Guildford from January 2013 to August 2014; representing a total maximum floor space requirement of 62,208m2 gross (see Appendix 6).”
23.14 The Appendix 6 list of retailer demand looks impressive with brands such as Joules Clothing; Fossil; Comptoir des Cotonniers; Moshulu; Rituals; Princesse tam.tam; Cycle Surgery; Majestic Wine; Game Stores Group Ltd; Iceland. However, if we look closely at Appendix 6 it is an amalgam of old unchecked national high street requirements some of which do not even include Guildford as a destination and the majority are hardly high quality comparison retail. There are also no “big” requirements in terms of space. Where are the big stores?

23.15 GH Pressley & Sons – Watches and Silver- Requirement “They are seeking a flagship diamond store in central London. Target locations include Mayfair, St James, Kensington and Knightsbridge. Brands will include Hans D Krieger and Marco Bicego.” This does not sound like Guildford.

23.16 Oxygen Red Ltd – Ladieswear- Requirement “Oxygen Red is looking to acquire temporary stores in Shopping Centre locations within the M25” Guildford is well outside the M25.

23.17 The data relating to retail demand does not appear reliable. The 62,800 sq m does not translate to real demand for an expansion of 500,000 sq ft. If proper due diligence was applied perhaps 30% of this alleged Carter Jonas requirement would survive proper scrutiny.

24 THE TOWN CENTRE OPPORTUNITY

24.1 I do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. What the town centre needs in terms of urban regeneration is much more residential development. As can be seen from the previous section retail will not work!

24.2 The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. The reality is that the Town Centre and other areas of brownfield in the borough has the capacity for at least 5,000/7,500 homes.

24.3 The additional target capacity of 5,000 could easily be provided within the following urban sites which have the capacity for 7,500 homes:

- 2,500 homes detailed in Masterplan 2015 including Woodbridge Meadows which can itself be increased substantially
- 500 homes at North Street
- 1000 homes on current GBC car parks (25 acres) and at the station
- 1000 homes saved in the urban area if 100% of students are accommodated on Surrey University campus (17 ha of car parks)
- 1000 homes at Slyfield on the 40 ha regeneration site
- 1000 windfall infill (50 per annum)
- 500 homes on brownfield sites in villages on sites of max 1ha which do not impact Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
25 POLICY E8 DISTRICT CENTRES

25.1 **I object** to policy E8 District centres

25.2 **I object** to the proposal that sites “on the edge” of District Centres should be considered for retail developments. This is another Trojan horse policy, allowing retail hubs to be vastly expanded in order to smooth the way for vast new housing estates outside in the countryside (e.g. to meet the “everyday shopping and service needs” of the roughly 1,500 people living in the 600 new homes planned for the Horsleys).

25.3 This is a case of back-to-front priorities. Expanded local retail hubs are being proposed in order to justify more housebuilding in the villages, and in a forlorn attempt to mitigate the serious traffic and infrastructure problems this will bring. The Council have no business preparing the way for new supermarkets in the Green Belt. Rural retail capacity should be left to local demand.

25.4 The policy proposes not a single measure to support existing rural shops and services that are the lifeblood of village communities, e.g. using business rates and other levers at the Council’s disposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4772  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

26 POLICY E9

26.1 **I object** to Policy E9 Local centres

26.2 **I object** (for the reasons given under Policy E8 above) to the proposal for retail development adjacent to the 6 rural centres, and sites on the edge of designated centres. This is creeping urbanisation, damaging to the Green Belt and to Guildford town revival as a thriving urban hub. It will contribute to local urban decay and depopulation, just as expansion of the suburbs did to mid-20th century London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4748  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
9 POLICY H1 HOMES FOR ALL

9.1 **I object** to policy H1 Homes for all.

9.2 Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

9.3 The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

9.4 I support higher density development in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes' walk of Guildford railway station. Much of Guildford town could usefully be regenerated with 6/10 storey blocks (there are currently blocks of this size already in the town) at 50 homes per ha with landscaping and underground parking, as often seen on the Continent and, recently, in London.

9.5 Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required on stilts with parking beneath.1

9.6 Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4749</th>
<th>Respondent: 15084897 / Save Send Action Group (Andrew Procter)</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

10 POLICY H2 AFFORDABLE HOMES

10.1 **I object** to policy H2 Affordable homes.

10.2 “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that
these homes will remain well beyond most people’s means and that starter homes will not become available for local people.

10.3 In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

10.4 I question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally (contradicting the Government’s policy of encouraging labour mobility and development in poorer regions, where homes are cheaper anyway); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes will be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and by the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed in the plan might influence the market in a more remote part of the UK, but not here.

10.5 This policy’s version of “affordability” is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### 32 POLICY I1 INFRASTRUCTURE AND DELIVERY

#### 32.1 I object to policy I1 Infrastructure and delivery

#### 32.2 Most of the borough’s infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. Yet this plan’s commitment to building housing estates across the Guildford countryside will mean either major infrastructure investment that no-one is prepared to pay for or else a catastrophic and simultaneous collapse in transport, educational, medical, energy, water and communications services.

#### 32.3 The plan targets greenfield sites – requiring heavy infrastructure investment – in order to generate CIL income necessary to meet an infrastructure shortfall that is already serious. This is not sensible. The current draft CIL scale also encourages development on greenfield sites rather than brownfield.

#### 32.4 The policy wording says nothing about roads and traffic. The Council’s methodology for assessing infrastructure needs in this area is inadequate, identifying only the tip of an iceberg of existing congestion. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that involve demolishing property and road-widening in residential areas to solve the resultant congestion. The A3 improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place. These detailed investigations are being deferred until the planning application stage and will be left to developers to prepare. If a site then proves to be unsustainable its Green Belt protection will have been lost for no reason and unsuitable development will take place by a more insidious process.

#### 32.5 Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritising greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly.

#### 32.6 This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognising this as a key issue, the plan is based on a wing and a prayer.

#### 32.7 The highways network is under stress at peak times in many parts of the borough. Queuing is the daily experience of drivers going to and from work. The local plan recognises the problems in para 2.14. Much of the road network is single-carriageway, and junctions act as constraints.

#### 32.8 The key evidence on future traffic conditions is provided in the Strategic Highway Assessment Report (SHAR) which summarises the results of the tests carried out by Surrey County Council at the request of GBC. Five scenarios were examined using SCC’s strategic traffic model.

#### 32.9 Scenario 1 contains all developments and planning permissions from 2009 to date. As such it corresponds to today’s circumstances, and describes the current unsatisfactory traffic conditions in peak periods.

#### 32.10 Scenario 5 represents the position at the end of the plan period, including all development and highways schemes in the local plan

#### 32.11 The results of the analysis show that there will be widespread congestion in the morning peak hour across the network. The key strategic routes, the A3 through Guildford NE bound, and the M25 between Junctions 10 and 11, are
shown to be at or over capacity. The summary network statistics presented in the SHAR, while useful, require some
interpretation because the analysis of vehicle-hours is derived from link speeds only, and does not reflect junction delays
and queues. The tables that show the ratio of flow to capacity and level of service are especially helpful to gaining an
understanding of the conditions on the network in the forecast. Where the forecast traffic volume is above or close to
capacity, flow becomes unstable and there is congestion. The SHA results provide evidence that, in 2031, congestion will
be worse than it is today on much of the network.

32.12 It is the case that the traffic modelling does not take into account the potential for increased use of other modes,
but the trip rates used for developments already have built in the typical level of use of other modes, and services will
be required to meet that need. It is also the case that the model does not allow for park and ride, which would improve matters
in the town centre, as discussed below.

32.13 In order to gain an insight into conditions across the network, it is necessary to combine information from
several tables in the SHAR. Table 4.5 shows that the M25 and A3 will be at capacity in Scenario 5. The other roads that
will have poor levels of service include those in Table 4.5 but also those in 4.12 (except the A3) and those in Tables 4.3 and
4.4 with levels of service E and F that will not be given some relief by improvement of the A3 in Scenario 5. Paras 4.10.3,
4 and 5 point out that there will be increased congestion. Given that the starting point is unsatisfactory, there can be no
expectation that the schemes in the Infrastructure Development Plan will provide an overall improvement. There will be
some local benefits, such as the Ash rail bridge for example, but in general conditions will be as bad and in many places
worse. So the statement in the SHAR para 4.2.5 that ‘the combined mitigation as reflected in Scenario5..indicates that at the
strategic level it accommodates the additional PSLP demand’ needs qualifying – ‘at the cost of a lot of queuing’.

32.14 The cumulative effect of the additional traffic generated by the developments in the local plan will be to increase
congestion, even with the proposed highway schemes in place. More detailed analysis of the junctions and queuing is
required. So we question the conclusion that the developments would have “an acceptable impact on the capacity of the
highway networks in terms of the policy test set in paragraph 32 of NPPF”.

32.15 Appendix 3 of the Transport Topic Paper shows the phasing of housing development and transport
infrastructure. The major scheme being considered for the A3 between the A31 and the A320 is scheduled for delivery in
the period 2023/24 to 2027/28. The strategic developments at Blackwell Farm and Gosden Hill Farm are shown as being
phased in from 2021/22 onwards. The Garlick’s Arch development is shown as starting in 2019/20. Therefore, there will
be a period in which the existing A3 has to cope with the additional demand arising from those developments before extra
capacity is provided.

32.16 The following comments regarding the strategic sites are taken from the SHAR:

32.16.1 Blackwell Farm – there will be congestion at the A31 junction, and the problems at the Tesco junction, and the
Egerton road /Gill Avenue junction (para 4.9.5). Traffic is likely to access the Surrey research park and the RSCH through
the development (para 4.7.3)

32.16.2 Gosden Hill Farm – there will be an increase in traffic through Burpham. There will be pressure on the A3100/
B2234 roundabout (paras 4.7.6, 4.7.7 and 4.7.8).

32.16.3 Wisley – traffic will increase on minor roads to gain access to the A3 (N and S bound) and other routes (para
4.7.11). The development will add more traffic to the A3. The Burnt Common slips help alleviate the traffic through Ripley
according to the model, but queuing on the A3 could mean this does not happen (para 4.7.14)

32.16.4 Normandy/Flexford – the report has little to say about the impact of this large development. The increase in
flow on Westwood Lane is noted (para 4.5.7). Tables 4.10 and 4.11 show junction delay reducing at the Westwood Land,
B3000 junction, but an increasing at the Puttenham Hill/Millbrook junction.

32.16.5 Ash – development in Ash is not specifically addressed, but there are major increases in traffic on a number of
roads. The new rail bridge will bring relief (but traffic will move to the next junction).

32.16.6 Slyfield – there are no remark relating to SARP, and as there are no additional trips shown in and out of the
Slyfield residential zone in Tables 3.3 and 3.4, it is possible that this development has been omitted. There is a significant
increase in trips to and from the Slyfield industrial zone, which will impact on the A320 and Clay Lane.
32.16 Town Centre – the report has very little to say about the town centre. It is evident that the model is forecasting severe congestion on the approaches to the town centre, such as the A281, the A31 Farnham Road, and Woodbridge Road for example. No mitigation measures are planned. And in the Transport Strategy, GBC states that the intention is to adopt Allies & Morrison’s Scenario 2 which would have the effect of significantly reducing the capacity of the town centre road system. The implications have not been examined, but traffic using the A281 from Waverley, for example, would be affected.

32.17 The local plan does not state an objective for congestion. The two strategic objectives that are included for infrastructure refer to supporting sustainable development and delivering a balanced system. However, in para 2.15 there is an aspiration expressed about opportunities ‘to improve the performance of the road networks through transport infrastructure and service improvements’, which taken with the previous paragraph includes reducing congestion. The evidence so far shows that this will not happen.

32.18 The mitigation proposed is not sufficient to overcome the problems that will be caused by the level of growth in the local plan. Congestion will worsen. The network will lack resilience and be vulnerable to disruption due to incidents. Minor roads will have to cope with a lot more traffic, for which they are unsuitable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/4789  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

33  POLICY I2 DEPARTMENT FOR TRANSPORT

33.1 I object to policy i2 Supporting the Department of Transport’s “Road Investment Strategy”

33.2 This policy is too vague and unrealistically optimistic. Decisions by Highways England on improving the strategic road network (the M25 and A3) are still years off. The Council have suggested a very expensive tunnel under Guildford, but this is no more than a dream. Even if Highways England accepted this (which is highly unlikely in the post-Brexit public spending climate) it would not be built until the end of the plan period at the earliest. Other, less expensive A3 improvements, and changes to the Junction 10/Heathrow stretch of the M25, will also take years to agree and complete.

33.3 The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is foolhardy. Surrey is the most congested county in England, with 683 people per square kilometre, compared with an English average of 413. This policy will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Waverley Airfield alone). This is a major development constraint that should have been applied to the OAN before this consultation, and not left up in the air.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
34 POLICY I3 SUSTAINABLE TRANSPORT

34.1 I object to policy I3 Sustainable transport for new developments

34.2 This is another vaguely aspirational policy, based on wishful thinking and not grounded in the practical realities of daily life. It consists of a standard, box-ticking list of local government measures unrelated to the specifics of the plan. Like infrastructure, transport appears to be an afterthought; the policy fails in its essential job of guiding planning decisions, since it assumes development of any kind can be supported by sustainable transport.

34.3 The sustainability of the dormitory settlements which the Council want built across the countryside depends on a general “modal shift” from private car use to walking, cycling and public transport. This is unrealistic. The proposed sites are often miles away from the nearest railway station. Bus services even in the largest villages are almost non-existent – just one bus to and from Guildford each day in the Horsleys and none at weekends. Since bus services depend on profitability, they cannot be expanded and the Council are not proposing to subsidise new ones. Rural buses are too slow anyway for busy people. Most rural roads in the borough are narrow, winding, hilly, potholed, muddy and unlit. Many flood badly and have no footpaths.

34.4 The desired modal shift would require a comprehensive co-ordination of bus and train timetables with services every few minutes, seven days a week, to stops within walking distance of every home in the borough. This kind of integrated public transport system has been achieved in Switzerland, for instance, but only at huge public cost and thanks to a political consensus supporting state ownership of trains, buses and the post office, which delivers rural passengers as well as mail. There is absolutely no chance of this in the UK.

34.5 The vast majority of the borough’s residents are not, in practice, able to cycle. This includes children, the elderly, commuters who have to look smart, the infirm, the unfit and people carrying goods or shopping of any kind. Dependence on walking and cycling discriminates against these groups, which include some of the most vulnerable members of the community. It is socially unjust. One in two working people in Guildford commute for up to 3 hours a day, as I used to do. They will not leave their cars for even part of their journey if it means longer travel times.

34.6 Park-and-rides are a welcome part of the transport mix but are too slow for commuters and others on a tight schedule. Well-off pensioners seem to be the main beneficiaries. For an adult couple going shopping it is still cheaper to park in town.

34.7 Forget about water buses. The Wey is too narrow and, with a river speed limit of 4mph, boats are too slow for anything but recreation. Except on the tideway, not even the Thames has such services.

34.8 The addition of two new stations appears attractive but will slow down train journeys, which are already slower than at any time since the 1930s. Knock-on effects on localities where the new stations are built have not been worked out or presented.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
| **Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

| 35 | POLICY I4 GREEN AND BLUE INFRASTRUCTURE |
| 35.1 | **I object** to policy I4 green and blue infrastructure. |
| 35.2 | This policy is a box-ticking exercise with no teeth to it. It sits oddly with the plan’s onslaught on the Green Belt. The plan to build on large areas of countryside and to inset villages will cancel out any benefits from extending the principle of enhancing biodiversity beyond Biodiversity Opportunity Areas. |
| 35.3 | There is no mention of the value of wildlife gardening to biodiversity or the important role that larger gardens play in a village setting. |

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

| **Comment ID:** PSLPP16/4796  **Respondent:** 15084897 / Save Send Action Group (Andrew Procter)  **Agent:** |
| **Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

| 36 | ABSENCE OF POLICY ON RIVER WEY |
| 36.1 | **I object** to the omission of a policy for the River Wey which was included in the previous local plan. The existing policy G11 from 2003 Local Plan should be included so that development within the River Wey corridor will only be permitted provided that: |
| 36.1.1 | It protects or improves the special character of the River Wey and the Guildford and Godalming Navigations, in particular their visual, setting, amenities, ecological value, architectural and historic interest; |
| 36.1.2 | The special character of the landscape and townscape in the corridor is protected or improved; |
| 36.1.3 | Views both within and from the corridor which contribute to this special character are protected or improved; |
| 36.1.4 | Where appropriate, public access is provided to and along the River and the Navigations. |
| 36.1.5 | The Nature Conservation value of the site is protected or improved |

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
12 POLICY P1 AONB

12.1 I object to policy P1 Surrey Hills Area of Outstanding National Beauty

12.2 This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

12.3 Much of my concern stems from the loose wording of the Policy, which in some places renders the policy ineffective, for example:

12.3.1 “All proposals will be considered against whether they…”

12.3.2 “All development proposals within and adjacent to the AONB will be expected to conserve or enhance its special qualities”

12.4 Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage. Of particular concern is the paragraph 3, which begins:

12.4.1 “Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits…”

12.5 This whole opening clause is unnecessary and almost invites development proposals. I believe that it should be deleted, and the sentence should therefore begin: “There is a presumption against major development in the AONB in accordance with NPPF.”

12.6 In addition to the weakness of the language, I am also concerned that the AONB criteria listed in the policy are not the most important ones in determining whether a planning application should be approved. Aside from the one outlined in the first bullet point (which relates to the AONB setting) none of these criteria is concerned with the key characteristics of AONB, ie landscape character, scenic beauty, important views, tranquility etc. Whether or not a development supports the rural economy or provides public access are of far less national importance than preserving the quality of the landscape itself.

12.7 I believe that the AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and would like to see the following sentences reinserted:
12.7.1 “The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered”

12.7.2 “Proposals within the AGLV which would have a negative impact upon views into and out of the AONB and which do not respect the setting, will not be acceptable”

12.7.3 In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/or AGLV may be necessary and deemed appropriate

12.8 Finally, I would like to see a clause which gives protection to the candidate areas for AONB status in the forthcoming Surrey Hills AONB Boundary Review. I consider that all land that has been assessed as meeting the latest Natural England criteria for AONBs should be subject to the same level of protection as an AONB, not just land that has been designated AGLV.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4747  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8 THE NEED TO APPLY CONSTRAINTS

8.1 Ministerial guidance in relation to building on the Green Belt is clear:

1. “the single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt” - Nick Boles to Sir Paul Beresford MP 7th February 2014.

2. “we were always very clear that we would maintain key protections for the countryside, and, in particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt” – Nick Boles to Sir Michael Pitt, Planning Inspectorate 3rd March 2014. 3. “Planning Guidance, updated in March 2014, also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt” – Nick Boles to Sir Paul Beresford MP 18th June 2014

8.2 70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries.

8.3 Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements).
8.4 Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 693 per annum to 500.

8.5 In view of the comments above it would appear logical to apply CONSTRAINTS in line with government policy to a corrected OAN. of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council.

8.6 This would result in a more acceptable and practically achievable HOUSING TARGET of 250 homes per annum which over a 20-year period would be 5,000 homes. All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 20,000 objections made by residents to the 2014 draft plan and also relieve the additional problems of inadequate infrastructure.

8.7 It would also mean that there is currently 8.5 years supply of housing (2131/250) which is made up of existing permissions granted (1,518) and completions made (613) during 2013/2015. (Monitoring Report by GBC 2015)

8.8 I have recently (9 July 2016) had a meeting with Sir Paul Beresford my own MP for Mole Valley who has kindly assured me that he is in the process of speaking to the Secretary of State to ratify the current government policy of protecting the Metropolitan Green Belt and to instruct the Planning Inspectorate and Local Planning Authorities accordingly. This is in the wake of the recent national referendum and the likelihood of the easing pressure on international immigration over the next 20 years.

8.9 The Brexit vote may have strengthened government policy further. Theresa May, the new prime minister in waiting, announced on 11 July that she is personally committed to protecting the Green Belt once she takes office.

8.10 Whilst I have many significant objections to the GBC Local Plan I applaud the policy statement by GBC in their Monitoring Report, “We will continue to monitor the use of previously developed land, and continue to identify as many opportunities as possible for redevelopment of previously developed land.” I believe it will be to the benefit of all residents if GBC can apply themselves vigorously to this endeavour in order to protect the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/4752  **Respondent:** 15084897 / Save Send Action Group (Andrew Procter)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

13  **POLICY P2 GREEN BELT**

13.1  **I object to Policy P2 green belt**

13.2  This policy states, “the general extent of the Green Belt has been retained.” This is completely false.

13.3  The policy wording is weak in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future
generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. It is an inalienable public good. Once gone it is gone forever. It is not the Council’s to give away.

13.4 Policy P2 completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world.

13.5 Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

1. Agricultural production
2. Rural leisure and tourism amenities
3. Water catchment
4. Flood control
5. Biodiversity
6. Natural heritage
7. A carbon sink for air pollution
8. Room for public facilities such as parks and burial grounds
9. Profitable film locations (e.g. Shere)
10. Future economic potential such as mineral extraction (even fracking)
11. Natural beauty, landmarks, open space, rural views and sight lines
12. Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

13.6 As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations.

13.7 It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.

13.8 I object to the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages. I am deeply disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development,
claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat.

13.9 I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors.

13.10 To “inset” two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need (especially post-Brexit) and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

13.11 Send is a good example of villages that should not be removed from the Green Belt. Send provides an important Green Belt buffer between Woking and Guildford. Yes, it is true that Send comprises old ribbon development but this should not mean it can be removed from the Green Belt so that Woking joins up to Guildford. The village and the countryside behind the A247 should all be protected.

13.12 I object to three particularly vulnerable areas of high quality amenity land being taken out of the Green Belt around Send which include:

1. The land behind the schools including playing fields and woodland.
2. The land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering.
3. Land to the left of Cartbridge going up to the old depot on the Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
same comments to deaf ears. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014.13

37.3 There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

38.4 All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4753   Respondent: 15084897 / Save Send Action Group (Andrew Procter)   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

14 POLICY P3 COUNTRYSIDE

14.1 I object to policy P3 Countryside (i.e. beyond the Green Belt)

14.2 This is more protective – as a policy – than the proposals for the AONB and the Green Belt, so is anomalous and wrong. I am not in favour of building on this area, since urban, brownfield areas are sufficient to meet all reasonable housing targets. There is no need to build on any green fields if brownfield, previously developed land is used efficiently (without garden-grabbing).

14.3 This policy refers to the countryside near Ash and Tongham (see paragraph 4.3.28). This area does not justify stronger policy protection than any other part of the borough. The fact that the current and previous Council Leaders represent it should not give it preferential status: “we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”. Green Belt and AONB areas should by definition have higher levels of protection than non-Green Belt areas.

14.4 It should also be noted that Ash and Tongham lie beyond Guildford far away from London and therefore make no contribution to controlling Metropolitan urban sprawl, unlike those villages which, ironically, are to be “inset”. That is presumably why Ash and Tongham are not in the Green Belt already. This policy, however, attaches higher priority to preventing the “coalescence between the Ash and Tongham urban area and Aldershot” than it does to the primary purpose of the Metropolitan Green Belt, which is to stop London sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4754   Respondent: 15084897 / Save Send Action Group (Andrew Procter)   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

15  POLICY P4 FLOOD RISK

15.1  I object to policy P4 Flood risk and water source protection zones

15.2  Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as Woodbridge Meadows Industrial Estate and the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

15.3  I strongly believe that this policy should not be used as a convenient excuse not to build on the extensive area of brownfield sites between the station and Ladymead. Any new development in this area could easily be built on stilts with flood resistant ground floor parking in areas that are identified as high flood risk. This area has been built over successfully over the last 50 years. We do not need to stop now.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4755  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

16  POLICY P5 SPAs

16.1  I object to policy P5 Thames Basin Heath Special Protection Areas

16.2  This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small as to be meaningless.

16.3  SANG (Suitable Alternative Natural Greenspace) is not beneficial since the sites identified or targeted are already green space. This is just using agricultural or wooded land as recreation land in order to justify building on other green spaces nearby. There is no actual increase in open space or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds – must also ensure that it is not using land which is adjacent to the Special Protection Areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6 POLICY S1 SUSTAINABLE DEVELOPMENT

6.1 I object to policy S1 as stated and the presumption in favour of sustainable development.

6.2 The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Policy S1 ought to set a clear framework. No definition of “sustainable development” is given.

6.3 The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

6.4 The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is useless. Under this policy, any development will qualify as “sustainable”, thereby failing to apply the NPPF’s most important guideline.

6.5 The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies.

6.6 The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

6.7 This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
7 POLICY S2 PLANNING FOR THE BOROUGH

7.1 I object to policy S2 the Borough Wide Strategy and the commitment to build 13,860 homes based on the Strategic Housing Market Assessment (SHMA) 2015 prepared by GL Hearn.

7.2 The OAN “objectively assessed need” figure in the SHMA of 693 homes a year is far too high.

7.3 I am very surprised and concerned that GBC have adopted the OAN of 13,860 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

7.4 Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50% from the 594 new homes identified in their own SHMA. “It should be noted that local evidence (Strategic Housing Market Assessment - SHMA) highlights a need for an additional 499 new affordable homes every year in the Borough and a total of 594 new homes every year when taking into account demand. Given the level of environmental constraints present in the Borough, it is considered that the provision of an average of 292 dwellings per annum represents a reasonable level of housing growth for Woking and is deliverable.”

7.5 Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”. This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement.

7.6 However it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt.

7.7 A detailed and comprehensive professional review of the SHMA dated June 2016 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 693 homes per annum to 510 homes per annum.

7.8 The 41 page report by NMSS which can be found on the GRA website entitled “A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford”. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan.

7.9 The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald who we were lucky to find. He is a niche consultant with the right skills and a national reputation. An independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit.
7.10 NMSS found that the SHMA used in the Local Plan incorrectly adds extra homes to its basic demographic projection to allow for improving affordability of housing, increased student numbers and economic growth. The report found that none of these additions were justified based on the evidence presented within the SHMA. The report concluded amongst other matters that: The affordability of housing in Guildford is no worse than in other Surrey districts and boosting supply beyond the demographic OAN would not result in a noticeable improvement in affordability but simply in more people moving to the area. There are reasons for believing that the SHMA’s estimate of the number of homes needed for students may be too high and that an adequate provision for students is already included in the demographic OAN. The report advises that the Council should commission a separate student housing need figure for Guildford given the distorting effect of students on our overall OAN. It envisages that, once this exercise is undertaken, improved accuracy means the overall OAN would be likely to reduce still further. The SHMA seeks to estimate the number of homes needed to support employment growth using employment rate assumptions that are inconsistent with the employment forecasts. This produces misleading results. An analysis of the Cambridge Econometrics and Oxford Economics forecasts using employment or economic activity rate assumptions consistent with the forecasts suggests that in neither case is there a need to provide more housing than suggested by the demographic analysis. Indeed, in both cases a smaller population growth (and hence fewer homes) could support the jobs growth that is forecast.

7.11 A further independent report was procured in 2016 by the Campaign for the Protection of Rural England CPRE from Richard Bate of Green Balance, an independent consultancy with expertise in demographic and housing matters to carry out a review of the GL Hearn SHMA

7.12 The report by Green Balance runs to 37 pages and its findings are that the OAN for homes in Guildford should be reduced from 693 per annum to 481 because:1. the vacancy rate figures should be taken from local government annual records rather than from the 2011 Census. This would reduce vacancy rates to 2.9% in Guildford.2. there should be no increase for affordability above basic demographic change.3. there should be no increase for Student housing and it was considered unrealistic that the University should be allowed to exert such substantial pressure on the domestic housing market. 4. the use of employment-led forecasts should be abandoned using purely household projections instead which are more reliable as a form of prediction.

7.13 Two completely independent expert reports are surprisingly consistent in their findings. In broad terms a figure of approximately 500 homes per annum would appear to be a correct estimate of OAN for Guildford. However, this is before constraints are applied to arrive at an acceptable housing target.

7.14 The SHMA is based on pre-Brexit projections for economic and population growth, including migration. These now need to be revised downwards.

7.15 It is unacceptable that demographic and economic model assumptions have been withheld by GBC and cannot be checked making the process unaccountable.

7.16 The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA.

7.17 Both the National Planning Policy Framework and National Planning Policy Guidance provide a clear policy direction that the overall housing target should be reduced by a variety of constraints to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors. I have corrected this omission below. Infrastructure policies should be planned at the same time as Local Plans but in this case they have effectively been left out and are not sufficiently developed.

7.18 The Framework also makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.

7.19 Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: SQLP16/839  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. LEGAL COMPLIANCE

3.1 Key parts of the evidence are missing, flawed or based on withheld assumptions.

3.2 The Strategic Housing Market Assessment overstates need, the Green Belt and Countryside Study uses a flawed approach and the Transport evidence is too late and incomplete to be relied upon to inform the Plan.

3.3 The Plan preparation process has had inadequate regard for national policy which attaches “great importance” to the “openness” and “permanence” of Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level.

3.4 The Sustainability Appraisal seems to have lost sight of the concept of Sustainable Development as described in the National Planning Policy Framework to the extent that we question whether it complies with the requirement.

3.5 It is unacceptable to treat Green Belt as a readily available source of development land during Plan preparation. The Mayor of London intends to respect Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level. Releasing Green Belt to fund infrastructure or build on open, previously-developed Green Belt does not pass this test. Opportunities to channel development towards brownfield locations beyond the outer Green Belt boundary, linked to sustainable transport, have not been adequately considered. It is not credible to suggest the Green Belt is being treated as permanent when its boundary was changed as recently as 2003 as part of the last Local Plan review. Indeed, land released in 2003 is neither fully developed nor efficiently used. An approach of eroding the Green Belt at each Local Plan review is not sustainable. If there is a case for Green Belt development, it needs to be proven through the application of policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/840  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
4 WHY THE PLAN IS UNSOUND

4.1 Guildford is physically constrained being a gap town set in the Surrey Hills AONB and in Metropolitan Green Belt. Significant parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, groundwater and surface water flood risk. Constricted road and rail routes converge to cross the downs seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach.

4.2 The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. **GBC have failed to apply any reduction which makes the plan undeliverable and unsound.** I believe it would be harmful to the character, quality of life and economy of Guildford not to reduce the housing figure to a number significantly below 13,860 new homes by 2033. I submit it would be counter to sustainable development as a whole (in particular to living within environmental limits and achieving a sustainable economy) and contrary to policy to develop on the scale currently proposed. I am concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site.

4.3 In view of the extent of physical and policy constraints, the inflated SHMA figure, and the transport evidence indicating that the Plan would lead to congestion, the OAN figure should be **500 homes per annum and the housing target after the application of constraints should be in the range of 250 homes per annum and kept under regular review.**

4.4 The extent to which the Sustainability Appraisal fails to test the sustainability of the spatial options in a meaningful way casts doubt over whether sustainability has been assessed. The report treats various major development sites in Green Belt, contrary to the importance attached to protecting Green Belt, as “a given”, fails to consider options that constrain development or that make greater use of brownfield or previously released greenfield land, focuses on a range of options that involve developing on even more Green Belt around Guildford in order to protect Green Belt around Woking does not consider environmental limits or impact on the next generation in terms of weighing demand for homes for the young alongside the use of all possible last resort greenfield options by one generation.

4.5 The National Planning Policy Framework requires that objectively assessed needs should be met unless: “any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted.”

4.6 The specific policies described include several of particular relevance to Guildford including sites protected under the Birds and Habitats Directives, Sites of Special Scientific Interest, Green Belt, Local Green Space, Area of Outstanding Natural Beauty, designated heritage assets and locations at risk of flooding. In this situation, is it appropriate for the Appraisal to rule out not meeting needs in full from a sustainability perspective?

4.7 Notwithstanding that the Sustainability Appraisal should be proportionate, strategic and look at significant matters, the assessment appears deficient and biased in the spectrum of alternatives it considers to the point that it is questionable whether it meets the requirements.

4.8 GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.

4.9 GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.

4.10 GBC has proposed an OAN of 693 houses per annum in the GL Hearn Strategic Housing Market Assessment (SHMA) which is unsound.
4.11 Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018. This is too late!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/838  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

SUMMARY

I request a confirmation by email from GBC that all of the objections made below are put to the Inspector appointed by the Secretary of State to review the GBC Regulation 19 draft local plan.

I request that once my objections are fully taken into consideration the draft plan is amended accordingly and re-issued.

Guildford is a constrained borough by the reality of having 89% of its area zoned as permanent Green Belt and an out of date road network that is already at capacity. I am concerned that GBC have adopted an inflated OAN of 13,860 homes as a housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance.

The application of constraints to housing need is a sensible and practical approach to development within the borough and is not only what GBC have done in the past in previous plans but is also what its neighbouring local planning authorities have done.

The scale of the housing number proposed in this plan, inevitably increases the onus for the plan to be seen to be sound. A substantially lower number of 5,000 homes, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

I am concerned that GBC have failed to grasp the opportunity of following clear government policy to develop in the urban area on previously developed sites. Many of these sites are in their ownership and it would seem a practical and readily achievable alternative which is much more acceptable to local residents.

In my opinion much of the proposed local plan appears out of date. It is like a voice from the past. Current trends in terms of property development such as the marked decline in town centre shopping centres and the need to create modal shift by developing residential uses close to transport hubs appear to have been overlooked.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/253  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base
Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 I object to the continued poor quality of the evidence base and lack of sound property market research that relates to the local market in Guildford rather than the continued reliance on generic economic capacity forecasts. As a result many of the submission documents providing key evidence are unsound, unreliable and inconsistent.

1.2 Key parts of the evidence base are flawed or based on withheld assumptions.

1.3 The latest SHMA 2017 still inflates the proposed housing figure due to the following factors:

1.4 An independent review by NMSS of the latest ONS population estimates and projections has found compelling evidence that there are substantial errors in past estimates of student migration flows. It is probable that migration flows out of Guildford, both to other parts of the UK and abroad, have been under-estimated by sizeable amounts.

1.5 Owing to the way in which migration estimates are used to construct population and household projections, the errors in past migration estimates are likely to mean that the latest demographically-based housing need estimates by GL Hearn overstate the number of homes needed by over 25%.

1.6 The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

1.7 38,357sqm of B1c, B2 or B8 use class is a quite sufficient supply for the plan period and does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

1.8 The ELNA states “that a large proportion of the net additional floorspace and land requirements for both office/R&D and industrial/storage uses could be met through the permissions which have been consented but which have yet to be implemented. However, there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

1.9 “There is the possibility that some pipeline developments may not come forward” is patently a weak argument indeed for the proposed industrial development at Burnt Common in the Green Belt and expansion of the Surrey Research Park into the Green Belt which has unused consents dating back many years and also the substantial latent potential for an increased density of development. The current plot ratio is less than 25%. The reason that the unused consents have not been used up is simple. There is a proven lack of demand.

1.10 Exceptional circumstances clearly do not exist to justify amendments to Green Belt boundaries as part of the Local Plan process. It is quite achievable for realistically prepared and identified development needs to be accommodated in Guildford’s urban areas and villages.

1.11 The Carter Jonas Guildford Retail Study Update 2017 lacks credibility and there is no proven case for expanding comparison retail space which is undermined by failure to implement existing retail consents at the North Street development over the last 10 years. The Guildford Retail Study does not take account of changing retail patterns in relation to the threat of the internet and the “clicks and mortar” conflict. The study also assumes a number of logged retail requirements from companies already in liquidation or with national requirements that exclude Guildford.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp173/260  **Respondent:** 15084897 / Save Send Action Group (Andrew Procter)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1.1 I object to the changes to Policies A36 to A41 (East and West Horsley)

1.2 The number of potential development sites has been reduced by two (A36 and A41, representing a total of 138 dwellings). This leaves four sites (A27-40) which still represent a total of 395 new dwellings.

1.3 Marginal changes such as these would still leave 70% of all new development in the borough built on Green Belt sites. No “exceptional circumstances” or any other justification is advanced for this strange imbalance.

1.4 The deletion of two Horsley sites fails to correct the issue of relative overdevelopment in East and West Horsley, which is both excessive in absolute terms and disproportionate in relation to the rest of the borough.

1.5 No attempt is made to assess the cumulative impact on the Horsleys – either of the four sites now proposed, or of Site A35 (Three Farms Meadow, alias “Wisley Airfield”), with over 2,000 new homes only 2 miles away. This piecemeal approach leaves the future of the Horsleys at the mercy of ad hoc planning applications, which is the opposite of what a Local Plan should intend.

1.6 The new plan Policies put greater emphasis on the need for adequate facilities and infrastructure to underpin development. But this is not reflected in any new wording on the Horsley sites, thus leaving most local objections unaddressed. Again, this defect curtails the plan’s usefulness as a practical planning tool at a site level and undermines its credibility among residents.

1.7 The plan fails to mention most of the known sustainability issues and infrastructure constraints affecting the Horsley sites, including public transport, traffic, road safety, parking, schooling, medical facilities, sewage, flooding/surface drainage and shops. These were fully set out in responses to last year’s public consultation.

1.8 The density of new housing on the four Horsley sites too is inappropriate, being greater than anywhere in the locality at present.

1.9 Sites situated on the periphery of existing development in the Horsleys encroach on surrounding open fields and require the extension of settlement boundaries. The plan presents no arguments for this which, contrary to NPPF paragraph 79, will contribute to creeping urbanisation by attenuating the Green Belt corridors separating the Horsleys from neighbouring settlements.

1.10 Collectively, the four Horsley sites breach NPPF paragraph 81’s encouragement of access to the Green Belt and its amenity and recreation value. This has been an outstanding success story in the Horsleys, as detailed in response to the last consultation. Assets include a dense public footpath network, parish parks, sports fields, a campsite of international standard, Britain’s newest rural opera theatre and the popular Olympic cycle route. These examples of positive planning
depend on a Local Plan that protects the Green Belt, maintains its openness and beauty and avoids urbanisation and traffic congestion. Sites A35-41 are hostile to this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2231  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? (): is Sound? (): is Legally Compliant? ():

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.

1.2 There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

1.3 Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt.

1.4 The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity.

1.5 The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

1.6 The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.

1.7 I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).

1.8 The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2233  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 I object to the changed policy A26 Blackwell Farm for 1500 homes which is still far too much.

1.2 There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

1.3 Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of Green Belt, and fulfils purposes 1, 3 and 5 very strongly.

1.4 The site is dependent on a new access road from the A31 (Hog’s Back) to the Hospital roundabout at Egerton Road, with a new signalised junction on the A31 at Down Place (just east of the A3 slip road). An independent traffic study commissioned by the Parish Council has shown that this new junction would result in more queuing on the Hog’s Back and on the A3 during the morning peak-hour, and as a result the villages of Puttenham, Compton and Artington will see a surge in traffic numbers as Guildford-bound drivers seek out the fastest route and divert along the B3000, B3100 or Down Lane.

1.5 Levels of nitrous oxide that are consistently well above the EU legal limit have been recorded at the A3 end of the B3000 over the last 2 years (GBC Air Quality Annual Status Report, September 2016. Compton Parish Council is expecting that this section of the B3000 will be made an Air Quality Management Area soon. Any traffic intervention that increases traffic levels through Compton (such as the proposed access road to Blackwell Farm), will make this situation worse and potentially have an impact on the health of residents.

1.6 The development will result in the loss of nationally important countryside - The new access road would cut through the Surrey Hills Area of Outstanding Natural Beauty (AONB), uprooting centuries old trees and scarring the north face of the Hog’s Back. It would also pass through an Area of Great Landscape Value and through, or next to, a belt of ancient woodland. The housing development itself and the proposed extension the research park, would harm the setting to the Surrey Hills AONB (the views into and out of the Hog’s Back ridge). The development site includes high-grade farmland and forms 20% of Compton’s green belt.

1.7 The development will produce more congestion at the Hospital/Tesco roundabout - This will impede access to the Hospital's A&E unit - a problem was identified by the Planning Inspector who presided over the previous Local Plan and who put a cap on traffic increases in the area of 5%. That cap has been exceeded (despite the University’s claim that construction traffic and buses don’t count). Guildford’s underlying traffic modelling is flawed and simply tweaking the Hospital roundabout and/or providing a new rail halt at Park Barn will not mitigate against the traffic generated by 1,800 homes, two schools, and an extended business park.

1.8 The new road proposed would be inadequate for the volume of traffic, and once the development has been built out it wouldn’t be long before new roads were required to serve the new population, which would inevitably pass through Wood Street Village (adding to the congestion in Worplesdon and potentially ruining Wood Street Village Green) and/or through Flexford/Wanborough, potentially ruining the conservation area of Wanborough, with its 13th century church and 14th century barns.

1.9 The development will result in more flooding. The Hog’s Back acts as a soak away for surface rainwater. Once its slopes are concreted over, this water will travel north, adding to existing flooding in Wood Street Village, Fairlands and Whitmore Common (a European protected habitat)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1.1 **I object** to the changed Policy A35 Wisley in respect of the identified mitigation to address the impacts on Ripley High Street and surrounding rural roads comprises two new slip roads at A247 Clandon Road (Burnt Common) and associated traffic management. This will not in any way mitigate the impact on Ripley High Street since traffic will need to pass through Ripley to reach Wisley.

1.2 **My previous objections therefore still stand for** this changed policy concerning the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers to try again.

1.3 There is in any case no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

1.4 This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected. Residents are disturbed by apparent political links between the ruling Conservative group on the Council and individuals connected to the developers, a shadowy Cayman Islands company.

1.5 Policy A35 should be deleted from the plan for all the reasons the development was rejected by the Planning Committee, including:

1. Green Belt location and absence of “exceptional circumstances”.

2. Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.

3. Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).


5. Absence of adequate traffic data.

6. Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.
7. Loss of high-quality agricultural land (55% of the site), in breach of national policy.

8. Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.


10. Cost of infrastructure required to the detriment of alternative more favourable sites.

11. Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.


13. Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.


15. Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.

16. Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).

17. Failure to evaluate the cumulative impact of this and nearby development sites on the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
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<th>Respondent:</th>
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1.1 **I object** to the changed policy A42 Clockbarn Nursery to 60 homes.

1.2 It ignores all the hundreds of previous objections made by local people

1.3 The increase to 60 homes in place of 45 homes is 33% more and too much.

1.4 It will worsen access and traffic problems in Tannery Lane and at the A247 junction.

1.5 It will make erosion of Green Belt in our village worse

1.6 It will make surface water flooding, which is already bad, even worse

1.7 It will impact open countryside views from the River Wey Navigation
1.8 The site is part of the permanent Green Belt at Send and should remain undeveloped in order to preserve the amenity of the surrounding area.

1.9 The site has very restricted access along Tannery Lane which is narrow and for most of its length only capable of providing access for cars in one direction. Development of the site is not therefore sustainable or practical.

1.10 Tannery Lane already provides access to a Business Park which generates a considerable amount of traffic at all times of the day including lorries. This narrow country lane cannot cope with any more traffic.

1.11 Planning consent has already been granted, rather unwisely given the access problems, for 84 flats and a marina. Anymore development at this location would not be sustainable.

1.12 The junction with Send Road has poor visibility and is dangerous for traffic entering and leaving Tannery Lane.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/2239  **Respondent:** 15084897 / Save Send Action Group (Andrew Procter)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1.1 **I object** to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches

1.2 It ignores all the **thousands of previous objections** made by local people

1.3 There is no proven demand for travelling show people plots in this location

1.4 There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.

1.5 The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.

1.6 This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.

1.7 The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

1.8 Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport.
Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

1.9 The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

1.10 I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in Send, Ripley and Clandon will result in the character of these villages being lost and the countryside encroached.

1.11 I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

1.12 I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

1.13 I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

1.14 I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

1.15 Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

1.16 Many of the affected villages, such as Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

1.17 With some 5000 houses being proposed close to the village of Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

1.18 The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

1.19 I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
1.20 Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

1.21 Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

1.22 Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

1.23 I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

1.24 I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

1.25 I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

1.26 It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1.1 I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site

1.2 This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.

1.3 The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sqm at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

1.4 There is in fact no justification for building anymore industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

1.5 There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

1.6 The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

1.7 The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

1.8 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

1.9 The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

1.10 The impact on small surrounding roads will create traffic gridlock.

1.11 It will join up existing villages and defeat the purpose of the Green Belt.

1.12 The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

1.13 The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

1.14 The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

1.15 I object to the potential impact of para 4.4.23a on Burnt Common with its over allocation of industrial zoning is subterfuge for a waste management facility which is a dishonest and underhand approach to planning and proper consultation.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 I object to the change by way of deletion of paragraph 4.5.8: “We will expect development to respond to local character and history, reflecting the identity of its context whilst allowing for innovative and forward thinking design….

1.2 There is no reasoned justification for this deletion and its omission will not make places better.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 I object to the change in Policy E1 sustainable employment because they have not addressed many of the 32,000 objections made to the 2016 plan.

1.2 I object to the inclusion of Send Business Centre/Tannery Studios Tannery Lane, Send in relation to proposed inset from the Green Belt because:

- There is highly restricted vehicular access along Tannery Lane in both directions.
- It is effectively an old non-conforming user in an area of outstanding countryside.
- It is adjacent to the beautiful Wey Navigation.
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate.

1.3 I object to the change in Policy E1 of proposed designation of Burnt Common as an Industrial Strategic Employment Site.
The impact on small surrounding roads will create traffic gridlock.

The 2017 Employment Land Need Assessment shows a reduction in demand to a low of 3.7 and a high of 4.1 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Burnt Common in the Green Belt.

The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land as shown in the Employment Land Needs Assessment 2017.

It was deleted from the 2014 draft because of all the local objections made previously and there is no logical reason to go back on this decision.

There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have many empty sites and industrial units.

There are patently no exceptional circumstances in terms of demand for employment space to build on this important area of Green Belt which effectively separates existing development in Send and Ripley and prevents urban sprawl.

It will join up existing villages and defeat the purpose of the Green Belt.

1.4 I also object to the potential inclusion at Burnt Common of a waste management facility mentioned at the change to paragraph 4.423a which lacks sufficient detail for proper consultation and is completely inappropriate.

1.5 I object to the ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 which generally is superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

1.6 I object to the fact that no reliable analysis has yet been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area.

1.7 GBC in their role as a Planning Authority appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of procurement of useful property market research analysis or forward planning.

1.8 What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8.

1.9 The lack of appreciation by GBC as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below).

1.10 Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan.

1.11 The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

1.12 38,357sqm of B1c, B2 or B8 use class is quite sufficient supply for the plan period and does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
1.13 Little regard is still not given to the opportunity of specific B1 b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub.

1.14 I support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires.

1.15 We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So I should target high added value small and medium sized enterprises rather than the headquarters of larger corporations.

1.16 We need to promote the idea of new knowledge transfer in incubator units and small premises for new start up enterprises. They need to be on the wave of innovative new technology as opposed to older established businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/700  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 I object to the change in policy E2 under paragraph 4.4.23a in relation to development involving waste management facilities to be directed to the Industrial Strategic Employment Sites:

• This fails to provide sufficient public consultation in relation to access and traffic flows
• This fails to provide sufficient public consultation in relation to unpleasant aspects of waste management

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/701  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
14.1 I object to the changes in relation to Policy E3 maintaining employment capacity which do not take account of my previous objections to this policy.

14.2 I object to the ill-informed policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land. It is also contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/702    Respondent: 15084897 / Save Send Action Group (Andrew Procter)    Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E4  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

1.1 I object to changes in policy E4 Surrey Research Park which is still earmarked for excessive expansion which is not supported by the findings of the Employment Land Needs Assessment 2017.

1.2 I support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. I object however to the completely unnecessary expansion of the Research Park into a larger Business Park.

1.3 I object to the extension to the Research Park of over 10 hectares will be delivered. This I understand will provide a total capacity of around 35,000 sq m of additional floorspace, of which 30,000 sq m is expected to be delivered in the plan period. This expansion is not effectively supported by evidence for an increase in B1b use class under the Employment Land Needs Assessment 2017.

1.4 I also believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. I also object to the inclusion of B1c light industrial uses which is inappropriate and unnecessary.

1.5 Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise.

1.6 There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user.

1.7 Research parks that lose their way stop being the location of choice for new innovative enterprises.

1.8 The Surrey Research Park in Guildford needs to be focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing.

1.9 Monitoring indicators should include new start-ups and new patents created.
1.10 Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments

1.11 The Surrey Research Park currently extends to 65,000 sq m. The research park is developed at a plot ratio of 25%. This could be increased to 50% within the same footprint of the existing park without damage to its amenity. The actual current land use for development in the park is in fact only 12.5% because most buildings are 2-storey.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp171/705  **Respondent:** 15084897 / Save Send Action Group (Andrew Procter)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E7

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

1.1 **I object** to the changes in Policy E7 Guildford Town Centre

1.2 I am of the opinion that policy E7 is still very ill-informed and there is insufficient evidential support to objectively assess the capacity of the existing town centre to accommodate appropriate new development and therefore fails the requirements of Section 161 of the NPPF to assess the real quantitative and qualitative floor space needs.

1.3 Policy E7 is still an aspirational voice from the past and is unlikely to benefit the health of the town centre in the future. There is no reliable evidence provided that the retail core of the Town Centre needs or can be expanded by 41,000 sq m of retail space at North Street because of lack of demand for retail units in the Town Centre particularly large units. This is due to falling demand for retail space in Guildford and town centres throughout the country evidenced by independent research and the reality of empty shops in many high streets (including Guildford) and the accelerating competition from internet shopping.

1.4 The recent Carter Jonas Study Retail Study 2017 update predicts total demand for Guildford Town Centre by 2020 at only 3,313 sq m and only 34,811 sq m by 2036. We have now been waiting some 15 years + for demand to catch up to enable development of North Street where the old consent for some 40,000 sq m of retail had to be renewed because it was getting out of date. Are we now going to have to wait till 2036 only another 19 years for demand to get to the point to enable development of this much prized site which developers have not exactly been falling over themselves to develop. That is also assuming that all retail demand in the Town Centre is wanting just this site.

1.5 However optimistically and quite illogically they protest that “there still remains significant capacity to support new comparison goods floorspace over the plan period”. It’s a bit like saying in town x we have currently 100,000 m of shopping and the UK retail forecast done by Experian shows that we can predict a growth of 10% therefore this means we must have an additional 10,000 sq m in town x. This is unscientific guess work.

1.6 In table 2 Appendix 6 of their report we learn that there is a potential for turnover to reach £856.3m in the town centre by 2020 however actual committed floorspace take up accounts for only £1.3m of this. This is 0.15%. It is hardly surprising that there are no details of take up or real demand evidence given anywhere in the report.

1.7 The Carter Jonas report is based on broad brush retail capacity forecasting derived from work by Experian which is very far from site or location specific and as a retail supply and demand assessment in my view is totally unreliable. The source is not even Guildford specific or even Surrey specific. The authors of the report do not disagree with my cynicism.
with capacity forecasting since they state up front that “It should be noted at the outset that capacity forecasts carried out over a long period of time are inherently less certain and should be treated with caution” and repeated again “at the outset we advise that all capacity forecasts beyond a five year period should be treated with caution. This is because long term trends in the economy, consumer demand and retail property market could have a significant impact on the potential capacity and need for new retail floorspace. For example, as discussed previously, a higher growth in non-store retail sales (i.e. Internet sales) than forecast by Experian would reduce the capacity for new retail floorspace over time.”

1.8 The Carter Jonas report is a vague whitewash report for a pre-conceived and outdated concept of increased retail development in the town centre. “For comparison goods, we have assumed the same estimations for convenience goods expenditure ‘inflow’ (10%) for Guildford Town Centre, again based on the centre’s role as a popular shopping and visitor destination.” Coming to the vague conclusion that Guildford is popular is far from reliable property market research!

1.9 The closest thing I can find to evidence of actual demand in this report is to read “In addition to focusing their attention on larger, dominant centres, many of the multiples and traditional high street retailers are changing their store formats and locational requirements. For example, key anchor retailers such as Boots, Next, Mothercare, TK Maxx, John Lewis and Marks & Spencer are actively seeking larger format units to showcase their full product range and to provide an exciting shopper environment backed by the latest (digital) technology.” But I then I realise this statement applies to any of 100 centres in the UK. I am concerned as to whether the authors of this retail study have actually visited Guildford or know where it is?

1.10 In their 2014/2015 reports Carter Jonas provided a fairly inaccurate picture of retail demand (originally Appendix 6) with the inclusion of retailers who had either gone bust or actually specified demand requirements in centres other than Guildford. This I note has now been deleted presumably because of its inaccuracies which were dealt with in my 2016 objection and has not been updated. We are now left with no demand assessment from either small, medium sized or large retailers. This does not support the view that Guildford is a vibrant retail destination requiring expansion with a large retail development in North Street.

1.11 The reality is that the town centre has enough retail floor space. If more is introduced it will result in the closure of existing shops particularly in locations which are less than 50% of peak Zone A or 100% positions. What Guildford needs is a new focus on speciality high quality comparison shopping supported by a revival of Guildford’s attractive heritage core and a new major visitor attraction supported by restaurants. Guildford needs to become the quality shopping destination for Surrey.

1.12 The existing site in North Street should be replaced with a well-designed ground floor high quality speciality retail mall and frontage of no more than 40 shops extending to 10,000 sq m with the rear and upper floors providing an additional 600 homes. The proportion of the above proposed smaller scheme at North Street will be complementary to and not antagonistic to the Upper High Street, Tungsgate, the Debenhams site and the 100% Zone A positions of the Lower High Street. If the existing policy under E7 is adopted the North Street site will remain empty for another 10 years.

1.13 I also object to the continued failure of this policy to provide much needed substantial residential development in the Town Centre which is still only a modest target of 1,300 homes. Only approximately 10% of the total planned for the Borough. There is still a blind over concentration on retail expansion which fails to take account of market forces and a complete failure to grasp the reality that a residential expansion is required to stimulate retail/leisure demand in the Town Centre which is markedly losing out to nearby centres such as Woking which has a very different approach. See the Town Centre Opportunity in next section.

1.14 I object to the deletion of the vision statement “Guildford town centre has a unique setting and historical character, and is at the centre of one of the most prosperous counties in England. We will protect and build on these assets and insist that all new development will be of the highest design and environmental standards. We will be proactive in building a great town centre which connects to the amenity of the riverside. We will invest in creating high quality public realm. We will put people above traffic and we will promote new high quality retail and business development. To achieve this we will develop innovative funding and delivery bodies. As we embark together towards this exciting future we pledge that we will continue and extend an active dialogue with our residents and other stakeholders.” Guildford Town Centre needs a decent vision. Without a vision the Town Centre is flying blind and it demonstrates the failure of the potential for imaginative Town development in this latest draft plan.
1.15 I support the deletion of paragraph 4.4.86 since many of the sites along the River Wey are capable of full development.

1.16 I object to the deletion of the Allies and Morrison Masterplan as a source document for the plan since although it failed to fully exploit the development potential of the Town Centre it did include many good ideas including more extensive brownfield development extending to 2551 homes including Woodbridge Meadows as a residential development site.

1.17 I do not consider that the modest target of 1,300 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. What the town centre needs in terms of urban regeneration is much more residential development. As can be seen from the previous section, retail will not work!

1.18 The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which was originally adopted by GBC. The reality is that the Town Centre and other areas of brownfield in the borough has the capacity for at least 5,000/ 7,500 homes.

1.19 The additional target capacity of 5,000 could easily be provided within the following urban sites which have the capacity for 7,500 homes:

- 2,500 homes detailed in Masterplan 2015 including Woodbridge Meadows which can itself be increased substantially
- 500 homes at North Street
- 1000 homes on current GBC car parks (25 acres) and at the station
- 1000 homes saved in the urban area if 100% of students are accommodated on Surrey University campus (17 ha of car parks)
- 1000 homes at Slyfield on the 40 ha regeneration site
- 1000 windfall infill (50 per annum)
- 500 homes on brownfield sites in villages on sites of max 1ha which do not impact Green Belt

1.20 Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. But first we must make 100% use of our urban brownfield in the town before we consider building in the Green Belt or countryside.

1.21 Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy that states clearly. “We are committed to a brownfield first initiative whereby all applications on previously developed land are given fast track priority and every facility to promote development for residential purposes and employment purposes in order to satisfy the needs of local people. In parallel a zero CIL incentive should be given for all residential development on brownfield land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1.1 I object to all changes in policy H1 Homes for all because they have not addressed many of the 32,000 objections made to the 2016 plan.

1.2 I object to the change by way of deletion of the paragraph on density: “New residential development is required to make the most efficient use of land whilst responding to local character, context and distinctiveness. Residential densities will vary dependent upon the local area context and character and the sustainability of the location. Higher density development will be supported in Guildford town centre.”

1.3 This indicates that GBC have no intention of building at a higher density within the existing urban area which is desperately needed and is in accordance with existing government policy. To have a plan with no density guidelines in the urban area is irresponsible and effectively very bad planning since it fails to exploit the development opportunities that urban areas can afford.

1.4 I support higher density development in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes’ walk of Guildford railway station. Much of Guildford town could usefully be regenerated with 7 storey blocks (there are currently blocks of this size already in the town) at 50 homes per ha with landscaping and underground parking, as often seen on the Continent and, recently, in London.

1.5 I object to the change in relation to student accommodation: “About 60 per cent of full time Guildford based on the University of Surrey eligible students population (full time equivalent) are expected to be provided with student bedspaces on campus.“

1.6 The University should provide accommodation for 100% of new first year students and more than 60% of existing students. This would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required on stilts with parking beneath.

1.7 I object to the change in relation to Gypsy, Traveller and Travelling Showpeople pitches and plots. Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

1.8 I object in particular to the inclusion of 6 Travelling Showpeople pitches at Garlicks Arch where there is no proven need.

1.9 I object to the deletion of the paragraph 4.2.8 on density: “We have a responsibility to use our natural resources, such as land, wisely. Efficient use of land is essential. Housing density describes the number of homes developed within a particular site area. It is usually calculated by the number of dwellings per hectare (dph). Increasing densities can help to reduce the land needed for new homes and make development more sustainable. It can also support more facilities and services. Certain areas can accommodate higher densities provided there is no adverse impact on the character of the area and the infrastructure is able to cope. Planning applications will be assessed on a case-by-case basis having regard to the local context, character of the surrounding local area and the sustainability of the location. This will include consideration of established street patterns, plot sizes, spaces around buildings, and relationship with nearby buildings as well as form, massing, height of existing buildings and structures, and materials.”

1.10 To have a plan with no clear density guidelines is irresponsible and effectively very bad planning since it fails to exploit the development opportunities that urban areas can afford.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
1.1 **I object** to the changes in policy H2 Affordable homes which still do not go far enough to address affordable or social housing need.

1.2 “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people.

1.3 In addition, “the viability clause” means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

1.4 This policy’s version of “affordability” is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

1.5 GBC has failed demonstrably to provide any significant social housing. Over the last 2 years a tiny 65 units have been built. GBC may have demonstrated a pre-determined agenda to build large numbers of high priced executive boxes for Londoners in the Green Belt but key workers such as nurses and teachers have been ignored. Opportunities for local not for profit social housing schemes, borrowing from the public sector at low interest rates and using existing GBC land holdings are extensive. But the political persuasion and intent of GBC does not seem to really want to accommodate local people in need. This is a great pity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1.3 This demonstrates GBC’s disregard for local housing need.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/709  **Respondent:** 15084897 / Save Send Action Group (Andrew Procter)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1.1 **I object** to the new Guildford Borough Council Transport Strategy 2017.

1.2 **I object** to ASP 3 new A3/A3100/B2215/A247 Burpham-Burnt common all-movements junction, formed by a new connector road linking between new A3/A3100 Burpham junction (SRN4) and the B2215 London Road, in combination with the new A3 northbound on-slip (SRN9) and the new A3 southbound off-slip (SRN10) under Infrastructure and Delivery.

1.3 If development gets the go ahead for the strategic site at Gosden Hill it would be logical to construct a 4 way A3 interchange at Burpham. It is not feasible to pass the problem down the line to Send which will already be bearing the brunt of traffic generated from a planned 4,000 homes. The A247 link road to Woking already at capacity will become gridlocked.

1.4 **I object** to SRN4 New A3/A3100 Burpham junction with relocated A3 southbound off-slip and new A3 southbound on-slip. This will place an unbearable problem onto the A247 whereby traffic will be passing directly through Send from the A3 and M25 and the proposed new development at Wisley.

1.5 **I object** to SRN9 A3 northbound on-slip at A247 Clandon Road (Burnt Common) and SRN10 A3 southbound off-slip at A247 Clandon Road (Burnt Common). This will place an unbearable problem onto the A247 which is already at capacity.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/694 **Respondent:** 15084897 / Save Send Action Group (Andrew Procter) **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
1.1 I object to the changes to Policy P2 because they have not addressed many of the 32,000 objections made to the 2016 plan.

1.2 I object to the new para (1) “The Metropolitan Green Belt will continue to be protected as shown designated on the Policies Map, against inappropriate development. In accordance with national planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.” The words “as shown designated on the Policies Map” should be deleted. The Policies Map has effectively ignored huge areas of Green Belt protection and the new para (1) is therefore a sham.

1.3 I object to the proposed change that Send Business Park should be inset from the Green Belt due to the fact that:

1.4 It is effectively a non-conforming user in an area of beautiful countryside adjacent to the beautiful Wey Navigation

1.5 It has restricted access along Tannery Lane

1.6 It should not be given the opportunity for further expansion or development

1.7 Policy P2 still completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world.

1.8 Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital.

1.9 It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.

1.10 I object to the statement in the Draft Local Plan under Green Belt Policy P2 (4.3.13) which claims that Send and a further list of 13 villages are “now inset from the Green Belt”.

1.11 This statement is untrue as GBC is proposing to “inset” these village. No decision has been made by an Inspector, therefore the villages remain in the Green Belt!

1.12 I object to the changed “insetting” of 15 villages (including Ripley) from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages.

1.13 I am deeply disturbed that settlement boundaries are to be hugely extended in many villages (particularly at Send) and that infilling is also proposed outside the settlement boundaries of 11 further villages. This is completely unplanned and unmeasured development outside of the OAN.

1.14 Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat.
1.15 Send is a good example of villages that **should not be removed** from the Green Belt. Send provides an important Green Belt buffer between Woking and Guildford. Yes, it is true that Send comprises old ribbon development but this should not mean it can be removed from the Green Belt so that Woking joins up to Guildford. The village and the countryside behind the A247 should all be protected.

1.16 I **object** to three particularly vulnerable areas of high quality amenity land being taken out of the Green Belt at Send which include:

1.17 The land behind the schools including playing fields and woodland.

1.18 The land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering.

1.19 Land to the left of Cartbridge going up to the old depot on the Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 I **support** the change to paragraph 4.1.4 “Local Planning Authorities are encouraged to include a policy within their Local Plan that embraces the presumption in favour of sustainable development. Policy S1 meets this requirement and adopts the model wording suggested. When implementing Policy S1, **local circumstances will be taken into account** to respond to different opportunities for achieving sustainable development. In accordance with the NPPF, **the presumption will not automatically apply to policies relating to sites protected** under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), **land designated as Green Belt**, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

1.2 I am of the opinion in terms of clear policy that GBC have made a definitive statement to support the Green Belt. I am however disappointed that they have failed to put this policy into sharp practice in forming this plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No )
Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 **I object** to the amended policy S2 the Borough Wide Strategy and the commitment to build 12,426 homes based on the Strategic Housing Market Assessment (SHMA) 2017 prepared by GL Hearn because it has not addressed many of the 32,000 objections made to the 2016 plan.

1.2 The OAN “objectively assessed need” figure of 12,426 is far too high

1.3 I am very surprised and concerned that GBC have adopted the OAN of 12,426 homes as the housing target **without any application of constraints** as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

1.4 Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50%.

1.5 Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”. This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement.

1.6 However it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt.

1.7 A detailed and comprehensive professional review of the SHMA dated June 2017 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 560 homes per annum to **400 homes per annum**.

1.8 The 19 page report by NMSS which can be found on the GRA website entitled “Review of GL Hearn’s Guildford Addendum to the West Surrey SHMA”. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan.

1.9 The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald who we were lucky to find. He is a niche consultant with the right skills and a national reputation. An independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit.

1.10 The NMSS recent study has found that the latest SHMA update by GL Hearn 2017 over estimates population growth for Guildford.

1.11 The report shows that an indication of the scale of the problem can be obtained directly from the ONS’s own data. Their estimates of births, deaths and population flows into and out of Guildford suggest that the population should have grown by 15,000 between the 2001 and 2011 censuses. The censuses, however, record a population growth of only 7,800. The discrepancy is over 90% of the population change indicated by the censuses.
1.12 The analysis in the NMSS report demonstrates that the errors must be in the population flows in age groups in which there are significant numbers of students. They are almost certainly the result of the under-recording of the numbers of students leaving Guildford each year.

1.13 If the projections are based on under-estimates of the number of students leaving the district each year, they will assume that people will be living in the area who will in fact have left. This means that they will over-estimate the likely growth in Guildford’s population. The ONS’s projections envisage that the population will grow by 21,700 between 2015 and 2034. However, if the estimates of past migration flows are adjusted to make them consistent with the census figures, this could fall to 13,000. As a consequence, the demographically-based estimate of the number of homes needed would be 400 homes a year (2015-34), not 580.

1.14 70% of the sites put forward in the Local Plan are still in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries.

1.15 Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements).

1.16 Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 580 per annum to 400.

1.17 I object to the fact that GBC have not used the guidance available to reduce the number of houses they propose.

1.18 GBC has not taken into account the possibility of lowering the required number of houses by adhering to the restraints offered in various papers. Government guidelines, even before the publication of the Paper, quoted below say that if a Council cannot supply sufficient houses without impinging on the Green Belt, then they do not have to build so many houses.

1.19 GBC have gone against the NPPF as they are not adhering to the ruling that Local Plans must plan positively to seek opportunities that meet objectively assessed development needs and be flexible enough to adapt to rapid change unless any adverse impact of doing so would significantly outweigh the benefits or specific policies in the NPPF which suggest that development should be restricted.

1.20 House of Commons Briefing Paper ; Planning for Housing no 03741, 14 June 2017. Guidance on taking account of constraints. “Need alone, is not the only factor to be considered when drawing up a Local Plan”. This includes “land designated as Green Belt” and “SSSIs”.

1.21 “The framework makes clear that once established Green Belt boundaries should only be altered in exceptional circumstances” and “should take into account any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.” (P d055 ref ID.3-045-20141006)

1.22 In view of the comments above it would appear logical to apply CONSTRAINTS in line with government policy to a corrected OAN. of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council.

1.23 This would result in a more acceptable and practically achievable HOUSING TARGET of 200 homes per annum which over a 20-year period would be 4,000 homes.

1.24 All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 32,000 objections made by residents to the 2016 draft plan and also relieve the additional problems of inadequate infrastructure

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I object to the Guildford Borough Council (GBC) Regulation 19 draft plan 2017 because it is not sound and the changes do not take account of my previous objections or indeed the 32,000 other valid objections that are shown on the GBC website and made to the previous 2016 version.

I have focused, as requested, on changes to which I find reason to object but this also includes some deletions which lack acceptable justification.

I request a confirmation by email from GBC that all of the objections to changes made below are put to the Inspector appointed by the Secretary of State to review the GBC Regulation 19 local plan 2017 and that all my previous objections to the 2016 draft plan will be placed before the inspector.

I formally request the opportunity to give evidence in person at the Public Inquiry currently planned for 2018 in relation to my objections in 2016 and 2017.

I request again that once my objections are fully taken into consideration the draft plan is amended accordingly and re-issued before it is submitted to the Inspector.

I am of the opinion that if it is submitted in its current form it will be in risk of being summarily dismissed and put back to the Council for resubmission.

Guildford is a constrained borough by the reality of having 89% of its area zoned as permanent Green Belt and an out of date road network that is already at capacity. I am concerned that GBC have adopted a lower but still grossly inflated OAN of 12,426 homes as a housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance.

70% of the new development proposed in this plan is in the permanent Green Belt which was coincidentally invented in Guildford under a private Act of Parliament in 1938. It is perhaps ironic that the process of Town and Country planning has become a type of Town v. Country debate.

The population in the borough is split equally between town and country but Guildford town has developed very little over the last 20 years and has not undergone the type of normal urban expansion, redevelopment of previously developed sites and increase in residential densities as nearby towns such as Woking have experienced. It is informative that Woking is currently outperforming Guildford in terms of economic performance.

It is interesting to note that urban densities in Guildford town are no higher than the villages that surround it. Even though the latter are in the main in the Green Belt which is protected from development and the former is in an area where...
there is no presumption against development. I am of the opinion we need a rebalancing between town and country and much more development in Guildford town, particularly residential development.

1.11 In the latest plan only 1,300 homes are going to be built in Guildford town which is some 10% of the total development proposed. It is very disappointing that GBC fail to set higher densities for the urban area and have in this latest draft deleted all reference to “density for development” which is normally an integral part of forward planning and development control.

1.12 GBC still fail to acknowledge that the application of constraints to housing need in respect of the Green Belt is a sensible and practical approach to development within the borough and is not only what they have done in the past in previous plans but is also what its neighbouring local planning authorities have done.

1.13 The current scale of the housing number proposed in this plan, which is based on a flawed SHMA, inevitably increases the onus for the plan to be seen to be sound. A substantially lower number of 4,000 homes, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

1.14 I am concerned that GBC have still failed to grasp the opportunity of following clear government policy to develop in the urban area on previously developed sites. Many of these sites are in their ownership and it would seem a practical and readily achievable alternative which is much more acceptable to local residents.

1.15 In my opinion much of the updated local plan still appears out of date. It is like a voice from the past. Current trends in terms of property development such as the marked decline in town centre shopping centres and the need to create modal shift by developing residential uses close to transport hubs appear to have been overlooked.

1.16 Unsupported assertions that there is real demand for the expansion of retail, industrial or office space lack credibility especially in the absence of significant planned expansion of residential development in the town centre which is universally acknowledged as a key stimulant for urban economic health.

1.17 There would appear to be two worrying examples where GBC are taking the role of “developer/landowner” rather than “independent not for profit public sector planner” in so far that they have a pre-determined agenda for building on the Green Belt rather than acting as careful, professional and responsible planner guardians.

Example 1: Policy A43 Garlicks Arch Burnt Common. The stated, albeit unproven, need by GBC is 400 homes. Normal residential density is 30 homes per ha. Land required would therefore be 13 ha. Land actually proposed to be allocated is 28.9 ha. This is more than double land required in beautiful irreplaceable Green Belt.

Example 2: Burnt Common Policy A 53. The stated, albeit unproven need, is 7,000 sq m B1c, B2 and B8 development. Normal density 50% plot ratio. Land required 1.4 ha. Land allocated 9.26 ha. This is more than six and half times more land than necessary in valuable Green Belt which the planners should be looking after.

1.18 I regret that my conclusion is that this plan is a clear example of bad planning.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/90  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent:


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): (No)

1.1 Guildford is physically constrained being a gap town set in the Surrey Hills AONB and in Metropolitan Green Belt. Significant parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, groundwater and surface water flood risk. Constricted road and rail routes converge to cross the downs seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach.

1.2 The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. GBC have failed to apply any reduction which makes the plan undeliverable and unsound.

I believe it would be harmful to the character, quality of life and economy of Guildford not to reduce the housing figure to a number significantly below 12,426 new homes by 2034. I submit it would be counter to sustainable development as a whole (in particular to living within environmental limits and achieving a sustainable economy) and contrary to policy to develop on the scale currently proposed. I am concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site.

1.3 In view of the extent of physical and policy constraints, the inflated SHMA figure, and the transport evidence indicating that the Plan would lead to congestion, the OAN figure should be 400 homes per annum and the housing target after the application of constraints should be in the range of 200 homes per annum and kept under regular review.

1.4 The extent to which the Sustainability Appraisal fails to test the sustainability of the spatial options in a meaningful way casts doubt over whether sustainability has been assessed. The report treats various major development sites in Green Belt, contrary to the importance attached to protecting Green Belt, as “a given”, fails to consider options that constrain development or that make greater use of brownfield or previously released greenfield land, focuses on a range of options that involve developing on even more Green Belt around Guildford in order to protect Green Belt around Woking does not consider environmental limits or impact on the next generation in terms of weighing demand for homes for the young alongside the use of all possible last resort greenfield options by one generation.

1.5 Policy in relation to sustainable development has been changed in a way that runs counter to GBC’s previous predetermined agenda for building on the Green Belt.

1.6 Under newly amended para 4.1.4 It is stated that "Local Planning Authorities are encouraged to include a policy within their Local Plan that embraces the presumption in favour of sustainable development. Policy S1 meets this requirement and adopts the model wording suggested. When implementing Policy S1, local circumstances will be taken into account to respond to different opportunities for achieving sustainable development. In accordance with the NPPF, the PRESUMPTION WILL NOT AUTOMATICALLY APPLY to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding. The National Planning Policy Framework requires that objectively assessed needs should be met unless: “any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted.”

1.7 Under this amended policy it is clear that the OAN should be constrained.

1.8 The specific amended policy described above is of particular relevance to Guildford including sites protected under the Birds and Habitats Directives, Sites of Special Scientific Interest, Green Belt, Local Green Space, Area of Outstanding Natural Beauty, designated heritage assets and locations at risk of flooding. In this situation, is it appropriate for the Appraisal to rule out not meeting needs in full from a sustainability perspective?
1.9 Notwithstanding that the Sustainability Appraisal should be proportionate, strategic and look at significant matters, the assessment appears deficient and biased in the spectrum of alternatives it considers to the point that it is questionable whether it meets the requirements.

1.10 The plan fails to produce a coherent development strategy for Guildford Town. GBC has deleted its independently commissioned Town Centre Master Plan by the well renowned firm of architects and master planners Allies and Morrison as a source document from the plan even though this master plan was previously well publicised and enthusiastically adopted by the Council.

1.11 Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2020. This is too late!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/53  Respondent: 15085793 / Deborah Ellis  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECTION TO SEND HILL DEVELOPMENT - POLICY A44, 1.9 - LAND WEST OF WINDS RIDGE & SEND HILL - LATE STAGE APPLICATION WITHOUT ANY PRIOR CONSULTATION  

I strongly object to the above proposed planning development by eroding Send's Green Belt status on the above site.

I object to your proposal to allow 40 houses and 2 travellers pitch sites, this being a newly designated site and not included in the regulation 18 draft. Therefore correct procedure has not been carried out by yourselves.

Send Hill is obviously a narrow single track lane, having managed to retain it's peaceful, beautiful countryside, currently enjoyed by all residents and dog walkers from other areas. For this reason it has permanent Green Belt status.

It is totally inappropriate to increase the traffic flow. The junction where it meets Potters Lane is very dangerous and residents have suffered accidents as a result of being unable to see any oncoming traffic. I rely on sound alone when pulling out and have narrowly avoided head on collisions in the past and therefore also make my objection on the grounds of safely.

Send's infrastructure cannot cope with the current population, the problems with doctor's appointments, school places and traffic are consistent. The Council would be well advised to ensure that it provides acceptable standards of living for the current residents before irresponsibly placing further stress on the living conditions of it's current council tax payers.

Please confirm receipt of this letter and advise the Council's statutory requirements regarding proposed planning consultations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPS16/1619  Respondent: 15086017 / Shuli Sinai  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/54  Respondent: 15086017 / Shuli Sinai  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We are writing to object to the proposed development at Garlicks Arch in Burnt Common policy A43. This proposal was added at very late notice after previously being assured by the council leader there would be no significant new changes to the DLP in Send. The use of regulation 19 further adds to the betrayal. This enormous new proposal must require a full consultation under regulation 19. The 2014 proposal for 430 houses was rightly reduced to 185 in April 2016. This late and hasty attempt to push through this plan increases the number to 485! A totally excessive and unneeded number based on inflated projections of population growth by GBC. The proposed light industrial units can easily be accommodated at Slyfield and the proposed 4 way junction to the A3 will cause traffic gridlock, noise and air pollution for local residents. All this without yet mentioning this 100 acre site is GREEN BELT (a word no longer found in the GBCs dictionary). With prime agricultural land, rare enough in Surrey, and ancient 16th century protected woodland within the boundary, this land must be saved. There is a brook running through the middle of the site essential for drainage and the area is prone to flooding already. The site prevents urban sprawl between Ripley and Send vitally important. The villages medical centre already extremely busy and local schools cannot cope with the 25% population growth this plan will bring to our village. We have received emails from relevant ministers and Sir Paul Beresford stating government policy is to protect the Green
Belt and listen to local residents in these matters. Why does GBC neither protect or listen to those it is elected to represent. Conservative councillors ran for election on a protecting the Green Belt, now elected they stab us in the back.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1618  
Respondent: 15086017 / Shuli Sinai  
Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (*)

I object to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available.

I object to the development at Garlick’s Arch because the site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The site is also subject to flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1617  
Respondent: 15086017 / Shuli Sinai  
Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (*)

I object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the (A247) would be gridlocked all day.

I object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

Finally we also object to policy A44 West Ridge and Send hill. Again this site is new, not included in the regulation 18 draft and not previously consulted on. This is high quality Green Belt land. The subsoil of the site contains documented land fill waste and is vented, making it totally unsuitable for development. Access is completely insufficient. Please reject these proposals they are unwanted, unnecessary and have zero local support.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3571  Respondent: 15086017 / Shuli Sinai  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford.

I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3574  Respondent: 15086017 / Shuli Sinai  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3576  Respondent: 15086017 / Shuli Sinai  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/3572  Respondent:  15086017 / Shuli Sinai  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  SQLP16/694  Respondent:  15086017 / Shuli Sinai  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary
development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.

I object to the development at Garlick’s Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks’ notice and without any prior consultation and is not required in terms of housing need either for the village or the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to the proposal to inset Send Business Park from the green belt because there is highly restricted vehicle access along Tannery Lane, which is very narrow. This is an area of outstanding countryside adjacent to the beautiful river wey navigation and once again this is another attack on the green belt, which is inappropriate and should be protected at all costs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp172/1192</th>
<th>Respondent: 15086017 / Shuli Sinai</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As residents of Burnt Common our area has been threatened with irreversible and excessive development on all sides completely destroying what is left of our rural landscape.

I object to policy a42 change at Clockbarn in Tannery Lane because;

there has been a 33% increase in planned new homes from 45 to 60 ignoring hundreds of previous objections and adding to traffic congestion at the a247 junction. Contributing to increased surfaced water flooding which already exists. It will impact on the countryside surrounding the river wey navigation and it is greenbelt land which should not be built on.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

once again, thousands of previous objections have been ignored and again there is no demand for so many houses or travelling show peoples plots at this location. This land is permanent green belt, and no exceptional circumstances exist for development. It is prime agricultural land and contains ancient woodland that has existed since Tudor times. Again, this area is prone to frequent flooding and contaminated by lead shots accumulated over 50 years. Living in Burnt Common Lane, we will be massively effected by this excessive development and planned new junction to the a3, massively increasing traffic in our area. Once again, this is green belt land that should not be built on, this will also join Send and Ripley into one continuous inhabited area, defeating the purpose of the green belt in separating our villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
it was deleted from the 2014 draft because of objections but now has been re-added to the plan. Along with Garlick's arch which previously replaced it. Even worse, the word minimum has been changed to maximum, despite a decline in demand for industrial land. Why plan an industrial development in the middle of the greenbelt, when Slyfield and Guildford still have empty units? The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough, not an excessive allocation of 10 hectares at Send, once again, this is green belt land and should not be built on. The increased traffic caused by this development and the Garlick's arch development and the new a3 junction will choke our village to death with congestion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/57  Respondent: 15094369 / Marilyn Scott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have been a Send Marsh resident for over 20 years and I am writing to object to the latest change made by Guildford Borough Council concerning the draft local plan for Send, in particular the designation of the Garlicks Arch site.

This objection is on grounds that not only is this site unsuitable for a number of reasons of which I will elaborate throughout the course of this email, but that the manner in which this last minute amendment to the local plan has been executed, which I do not believe has been carried out in a fair and transparent manner; considering the time-frame, the extent of the amendment and finally the lack of consultation with residents, Parish council and the necessary regulatory bodies concerned with proposed development.

Firstly I would like to bring your attention to the application 16/P/00783 on Oldlands Field Yard, a small area of the recently earmarked site for mass development on the Garlick's Arch site, of which there is a proposal for 9, two storey dwellings that was filed almost exactly a month (12th April) prior to this latest last minute amendment to the local draft plan on 11th May. This appears to be too much of a coincidence and exemplifies the seeming lack of transparency and stealth tactics employed by Guildford Borough Council and developers in seeking approval to develop part of the site in question, which would provide a 'foot in the door development' and platform to further develop the wider site and strengthen the case for the inclusion of the Garlick's Arch site within the draft local plan. Furthermore, there is evidence to support this possibly cynical view in the possibly over-comprehensive extent of accompanying reports to the 9 dwelling development, and the transport modelling being undertaken by Surrey County Council and Highways England, which would reveal that GBC have known about the change in site designation for the local plan and benefits afforded by the initial 9 dwelling development for some time. There has however been a lack of publicity and public consultation for both these cases, and the change in site designation in the amendment comes 8 working days prior to the full council meeting - surely unacceptable in view of the above and considering the extent of the change and impact of an additional 300 dwellings on both the villages of Send and Ripley. If not mandatory, surely there is a duty of care to notify the residents of these areas affected for even the site being included provisionally, despite the 6 week allotted public consultation period after the decision reached on 24th May.

The site in question is deemed to be medium sensitivity in terms of Greenbelt yet it is being considered for mass development when there are not only low sensitivity areas available in close proximity but a list of brownfield sites - arguably in more strategic locations with regards to the industrial designation of the site, available for re-use in for example, Slyfield, as per the 'previously developed site' report also published by GBC. In the mass development study and
village expansion survey it evaluates that Ripley is unsuitable - how then can a development site of this scale be promoted in the local plan that will implicate Ripley for the very reasons that deemed it unsuitable? These sites cannot be treated in isolation, and this site at Garlick's Arch straddles both parish council zones and will have wide-ranging implications for the residents and well-being of not only Ripley and Send, but also Clandon.

I object to the housing need assessment - It is forecast that the population of the Guildford borough is actually set to plateau and decrease (and any statistics contrary to this are surely inflated by the false counting of university students who do not reside past their degree period), so surely therefore there is no need to increase the 13,860 houses already proposed for the borough by 300 in this development, and certainly no local need in Send to expand the Village by 25%.

One of the reasons for the preservation of Greenbelt is preventing Urban sprawl and preventing the merging of towns and settlements - the site at Garlick's Arch, once fully developed would represent the single largest development in the area, not only in isolation but also if coupled by the Send Marsh Road/ Linden Way housing estate positioned opposite, only separated by the Portsmouth Road.

The site is not only Greenbelt land but also has 4.6 hectares of permanently protected ancient woodland which requires Forestry commission consultation and approval for any development in close proximity to in the first instance. Has the council considered this or given any thought to the implications the removal or damage to this woodland will have on not only the UK's ancient woodland stock but to the damage to local biodiversity and habitats of wildlife?

The impact of this site on congestion and road traffic is another element which seems to have been overlooked by GBC. Whilst there is assessed benefits by GBC in the 11th May amendment of an additional junction onto the A3, surely this is short-sighted considering the resulting increased congestion on not only the A3 from this but also on the surrounding local roads of which, during traffic gridlocks, will be used by road users to avoid the A3. In addition, as identified by GBC in a congestion and traffic strategy report published in 2014, the Wisley A3/M25 interchange is already a bottle-neck for traffic congestion.

At a micro scale, The Portsmouth Road adjacent to the site and in particular the junction with Send Marsh road of which this new development is within 350 yards of, already experiences a high level of congestion and traffic

If we are to further assess the potential impact of this mass development in terms of education provision, it is already well known and publicised that this area of Surrey is well oversubscribed. The increase in 400 dwellings will not just place further strain on this system but will be untenable considering that during the period 2014/15, not only the schools within catchment area of this site but within a circa 15-20 mile radius, currently experience an average ratio of 2 applicants per place for both primary and secondary education.

These are pertinent points which require careful thought in relation to the sustainability of the Guildford Borough as a place for quality of life offer in the long term, in particular the areas of Ripley and Send. Mass development proposals in unsuitable locations and on unnecessary scales such as this cannot be justified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy A43 change because it ignores all previous objections made. It will cause over development of our village and the number of homes is excessive. It will generate excessive traffic in an already highly congested area. The current infrastructure cannot support that number of new homes. The development area is subject to flooding and is in a zone 2 flood allocation. The area is permanent green belt and no special circumstances exist to ignore this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3074  Respondent: 15094369 / Marilyn Scott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 change. It has previously been deleted because of major objections. There is no need to build industrial buildings in the centre of the green belt when Slyfield still has empty sites. The impact on surrounding rural roads will cause excessive traffic congestion. It will defeat the purpose of the green belt in preserving the rural area. There is no proven need for industrial buildings in the Send Ripley area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/58  Respondent: 15094465 / Roy Vinall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the planning application A43 and A43a on two main grounds.

Firstly the amount of traffic: the excess of traffic caused by these developments, on what is already an overworked junction between Sendmarsh Road and the old Portsmouth Road into Ripley, will not only cause long delays for traffic at all times but will endanger to the public trying to cross the road or be picked up on the School run coaches.

Secondly the increase on our overstretched public services in the Send area: as a member of the Send Villages Medical Centre P.P.G I know that the Surgery is now overrun with it’s current Patient base. Send local Schools just can just about cope, so how can you justify extra houses and factory outlets without providing extra facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
This entire plan seems ill-thought out as it applies to the local population. It will fundamentally destroy the nature of the environment, community culture, and quality of life of those who currently live there, and those who you believe will move in.

It's clear that no realistic thought has been invested into how practical it is to bring in so many people. There are simply not enough schools, roads, medical facilities, and land. Firstly, building more schools/roads/hospitals is more easily said than done. Secondly, this will take years to complete. For anyone who has lived next to a single house undergoing renovation for a period of 3-6 months, this will pale into insignificance to a 2-5 year project (and that is just the houses). That doesn't reflect the traffic, degradation of roads/services, and increase in crime. Assuming that a supposed increase in resources were also provided, this would be an additional 5-10 year project, which would need funding and complete commitment from the existing community. The prevalence of flooding across the country shows that building on flood planes is unsound, and has knock-on consequences across the board. We already experience flooding here (every few years), but it is likely to be exacerbated as a direct result of this project.

From every so-called consultation I have seen, there is a clear demand from the population to avoid this taking place. We seem to be in a position where no matter how much we object, we are asked again and again until we simply tire of it, or miss out on an opportunity to respond in a timely fashion. This is undemocratic, and a terrible reflection of the contempt being shown to the community and due process.

I understand that there is a need for more residential properties in the UK, but this location is far from ideal, and the cost paid by each resident here far outweighs the benefit achieved by new houses. Success for those moving in, is not having a place to stay, but a viable residential and familial experience. Those being promised houses here, are not going to experience what the village currently does. That community will no longer be. This is a false promise, a false economy and disingenuously being used to drive a financial agenda, not a social one.

The additional fact that green belt land is being used to support this suggests that there are now few boundaries being respected. This doesn't bode well for any organisation that is expected to honour rules and regulations in the future. What hope do we have when we've already stretched the definition of compliance? Destroying large areas of protected land will impact on wild-life, air quality, and psychological health. It also impacts on the council's ability to represent themselves with any sense of credibility. Despite every comment being made, there seems to be a polite nod, but no respecting the opinions and demands offered.

This whole process has little credibility and seems highly indefensible.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/298  Respondent: 15097345 / Rosemary Key  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford.
2. I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded.
3. I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.
4. I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.
5. I object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the (A247) would be gridlocked all day.
6. I object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25.
7. I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially
8. I object to the development at Garlick’s Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks’ notice and without any prior consultation and is not required in terms of housing need either for the village or the borough.
9. I object to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available.
10. I object to the development at Garlick’s Arch because the site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The site is also subject to flooding.
11. I object to building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.
12. I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill
waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

13. I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

14. I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.

15. I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

16. I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/78  **Respondent:** 15097345 / Rosemary Key  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/173  **Respondent:** 15097345 / Rosemary Key  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy A58 because increasing the industrial area and its associated increase of larger vehicles traffic will again impact on the local infrastructure. The roads and motorway access are not in a state to manage this increase in heavy traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/39  Respondent: 15097569 / sally Chandler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/79  Respondent: 15097569 / sally Chandler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I disagree

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/126  Respondent: 15097569 / sally Chandler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I wish to complain about every aspect of the local plan. I still find it impossible to use your site. Will you please respond stating that my objections to every section have been recorded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A43 - I OBJECT - the proposal to develop the land at Garlick's Arch is NEW and was not included in the Regulation 18 draft and has NOT been consulted on previously. It is Green Belt and should not be built upon, there are no exceptional circumstances. It is an area of great natural beauty and what GBC is proposing is simply outrageous and would involve the destruction of ancient woodland. The proposed industrial development is not required and a new 4 way interchange onto the A3 would be disastrous for Send. The Send road (A247) would be gridlocked all day as it would be a through route to Woking for traffic leaving the M25 and the road infrastructure is insufficient to take this significant increase in volume of traffic.

A44 - I OBJECT - the development of the land west of Winds Ridge and Send Hill is new and was not included in the regulation 18 draft and has not been consulted on previously. Any housing development is inappropriate due to its status as Green Belt land within an area of beautiful country side. I OBJECT to GBC building on Green Belt land and to the removal of Send from the Green Belt. Furthermore, the subsoil of the site contains unsafe landfill waste which is currently vented. The proposal to include 2 Travellers Pitches is inappropriate due to the narrow width single track country road which does not allow sufficient access.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT. Send should not be removed from the Green Belt. The village provides an important buffer between Woking and Guildford and without the Green Belt status the entire area will be covered in urban sprawl. There are no exceptional circumstances which give GBC the right to do this. In particular the land at Garlick's Arch is covered in ancient woodland and should not be built upon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/79  Respondent: 15097697 / Lisa Bedworth  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I object. I do not agree that there is sufficient evidence for the need to build so many additional houses and industrial space in Send and in particular at Burnt Common. The Employment Land Needs Assessment (ELNA) 2015 shows an 80% reduction in employment space required form the ELNA 2013, and therefore the additional industrial space proposed at Burnt Common is not required and there is insufficient evidence to support the need for it. I do not understand why the Council would propose such a new site anyway when Slyfield would be the appropriate site for any further development.

There is insufficient evidence to support the need for the additional housing proposed in Send and the number of foreign students has been wrongly used to inflate the need for additional houses. The proposal also would remove Send from the Green Belt and I OBJECT VERY STRONGLY TO THIS. There is insufficient evidence to clarify how the local infrastructure would cope with such a development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/80  Respondent: 15097697 / Lisa Bedworth  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)
I object. Guildford Borough Council have not followed the correct process in relation to the number of houses to be built in Send. Since 2014 GBC has changed every major site in Send proposed for development and now just added a massive new road junction at Burnt Common. These are significant changes and require another full consultation under Regulation 18.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1640  Respondent: 15097697 / Lisa Bedworth  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Garlick's Arch, Send Marsh, A43

I object to this policy because

There is no proven demand for Travelling Showpeople plots in this location

This is beautiful Green Belt countryside and there are no "exceptional circumstances" that should allow building on this land

It will join up Ripley and Send and defeat the purpose of the Green Belt

It is subject to frequent flooding

It will cause over development of our village and the number of homes is excessive

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1639  Respondent: 15097697 / Lisa Bedworth  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Land at Burnt Common, London Road, Policy A58

I object to this policy because:

It was deleted from the 2014 draft because of all the objections made previously. The fact that it is now included shows a failure of process and a lack of democracy.

It now includes the word "minimum" which is a change from the previous "maximum" in the 2016 plan and there has been a decline in demand for industrial land so this makes no sense at all and opens this site to unlimited development well beyond what is in the local plan.

Building industrial/warehouse in the middle of the Green Belt is outrageous, particularly when there are empty sites and industrial units at Slyfield and Guildford.

The impact on the traffic in Send and Ripley will be considerable and it is already extremely busy. There are many children and cyclists on these roads and their safety will undoubtedly be compromised by the additional heavy traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/438  Respondent: 15097697 / Lisa Bedworth  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt Policy 2 at Paragraph 4.3.15

I object to the proposal to inset Send Business Park from the Green Belt because

Further expansion or development in this location detracts from the openness of the Green Belt

It is an area of outstanding Natural Beauty adjacent to the beautiful Wey Navigation

There is highly restricted vehicular access along Tannery Lane in both directions, it is extremely narrow.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/87  Respondent: 15098145 / Lisa Kenny  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
I am writing to object to the Draft Local Plan with particular concerns for Send and its surrounding area. I wish my concerns to be seen by the planning inspector and taken into consideration when a decision is being made.

My first concern is that Send is being removed from the Green Belt. This is extremely concerning as one of the original functions of Greenbelt Land was to act as a buffer zone between large urban areas thus preventing urban sprawl. The restrictions on development have always allowed settlements to maintain their own identity and prevent smaller settlements becoming engulfed. This completely goes against one of the aims of the plan which is to ensure sustainability. Sustainability means meeting the needs of the present without compromising the needs of the future. Removal of Greenbelt status could mean no future for the village as it is engulfed or grows so large it's sense of community is lost.

My second concern is that my understanding was that if significant changes were made to a plan, a full consultation was required. Having read the plan I was shocked to see that a new road junction is planned on the edge of the village. This has not been mentioned previously. Linked to this is the plan for 400 new homes at Burnt Common. This will put extreme pressure on local services along with adding to congestion and thus air pollution. In addition, Greenbelt Land will be destroyed which is completely unacceptable and clearly not inline with the 'sustainable' aim of the plan.

It is widely accepted that Brownfield sites are the most appropriate sites for redevelopment as they already have well developed infrastructures and do not require the destruction of the natural environment. With this in mind, you can appreciate how concerning it is that you seem willing to allow development on so many areas of Greenbelt in and around Send. Growth of the village would put additional pressure on the infrastructure and services and at peak times the main Send Road already struggles to cope. What also doesn't seem to have been considered is the addition of impermeable surfaces will cause shorter lag times and impact river levels downstream as well as localised flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/339  Respondent: 15098209 / b (Jane Dennis)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I object to the revised plan for S1,S2,H1,H2,H3,P1,P2,P3,P4,P5,E5 E6, E7,E9,D11,P12,P13,P14 - on the basis that A46 was not proposed or considered as a strategic site in the first consultation - it was safeguarded and was not removed from the GreenBelt. No exceptional circumstances have been demonstrated or approved. It also fails the National Planning Policy Framework - it is a Builder Led building proposal not local Parish Council/residents. We don't need a secondary school, many in the area are currently under-subscribed! - just one example of why it fails NPPF. There has been NO meaningful engagement with local residents.
There is inconsistency on how you are measuring Sustainability versus Sensitivity - Normandy and Flexford are two separate villages, on one hand you treat them on one = Sustainability. On the other, Sensitivity, you treat them as two separate. I object to this approach, it is illogical and unfair.

I object to the claim that A46 will lead to improving services for local residents. this is not fact, all shops and pubs in the village have closed over the years due to lack of trade - NO ONE IN THE VILLAGE USED THEM!

I object to the treat to the Thames Basin Heath Special Protection Area -A46 is only 800 metres away from the TBHSPA so it is within the 400m zone of Protection

There is a risk of flood, no consideration is being to your own Surface Water Management Plan which excluded land north of A46 because of Flood Risk.

I object to the disproportionate scale of the proposed building works in Normandy, it is completely unjustified and will destroy our rural environment. The road network cannot cope today, long delays on the A31 and A3 trying to get into Guildford or onto the major road networks to get to work. Also the detrimental health issues caused by massive development, plus the noise pollution and the continual noise and traffic chaos with Lorries and Construction materials and vehicles

I object to the basis of the plan which is distorted by large student numbers from Guildford University, which disproportionately increases the 'required' number of houses. the University must provide campus housing for the students, not destroy greenbelt land by trying to accommodate students off campus. The SHMA is not justified and should be reviewed.

GBCs local plan is unsustainable and is against the wishes of most local residents. There are many BrownField Sites in the Guildford area that would benefit from development of some type - there is no reason to destroy greenbelt land and affect areas of beauty and nature

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/4227  **Respondent:** 15098945 / ALISON TURNER  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. Policy A44.Land West of Winds Ridge and Send Hill- I am horrified to see this included in the pl
   1. It's NOT included in the regulation 18 draft and has NOT been consulted upon previous
   2. Housing development is not lawful due to this area's permanent Green Belt status and high quality
      countryside which is much loved by dog walkers, children and local wildli
   3. The narrow width single track lane cannot cope with HGV lorries and vans and particularly will not
      provide access for mobile homes uni This lane is very much appreciated by local residents.
   4. Send Hill, by its nature, provides a much loved country environment, it would be a catastrophe if
      Guildford Borough Council decide to wipe this out by placing traveler pitches and housing in this
   5. The proposed change to this recreational area will damage local wildlife including owls, pheasants,
      deer, geese, foxes and birds.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/8983</th>
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1. POLICY P2.Send should not be taken out of the Green Belt Send provides green space between Woking and Guildford.
   1. Send is a much loved village which actively encourages village activities.
   2. It has strong historic links to the local area including Henry VIII, Sir Francis Drake, one of the oldest churches in the country as well as its links to neighbouring historic Ripl
   3. There is outstanding countryside in Send and its surrounding areas including country lanes and peaceful Wey Navigation walks
   4. It would be a huge loss to erode our much loved village by taking it out of its Green Belt protection

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Guildford Borough Council have not followed correct I strongly feel the council has totally disregarded resident views. The 2014 proposal for 430 houses went down in April 2016 to 185 and now I see it has gone up again to 485. These huge changes should go to full consultation under Regulation 18, not the shortcut of Regulation 191 This makes a mockery of the whole process.

It is very upsetting for our community that GBC are considering the above, I do hope that consideration will be made to the outstanding beauty of our countryside, our historic links and our wildlife and that our Green Belt protection is upheld.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: SQLP16/605  Respondent: 15098945 / ALISON TURNER  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

The evidence is not factual, hence it is not based on lawful or honest grounds

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/607  Respondent: 15098945 / ALISON TURNER  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

The evidence is flawed and not factual

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/610  Respondent: 15098945 / ALISON TURNER  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The basis is not sound, consideration has not been given to the adverse impact on our historical villages. Send is in the Green belt therefore making the proposals unsound and unlawful.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** SQLP16/612  **Respondent:** 15098945 / ALISON TURNER  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** (No)

I object

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** SQLP16/614  **Respondent:** 15098945 / ALISON TURNER  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** (Yes)

I am a local resident and would like to be involved.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** SQLP16/616  **Respondent:** 15098945 / ALISON TURNER  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

Send hill sites - the areas highlighted are landfill sites with methane gas discharge.
The sites are in permanent green belt area.
Southern county searches report E.2978.sn_hcp dated 5 jan 2005 identifies landfill site ref gu/12 with unrestricted waste.
This causes great concern of what it contains.
I am concerned about the water table being disturbed and flooding to my property.
The traveller accommodation assessment purported to have been undertaken in 2012 by Mill Field Services is flawed as this company dissolved in 2011 according to Companies House.
There has been a lack of consideration to the deterioration of our historical villages.
The site is NOT large enough for its proposed use and Send Hill is a single track country road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/50  Respondent: 15099265 / Andrew Crawford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **Congestion on the trunk roads, A3/M25**
   I object to the development of the strategic sites due to A3 and M25 already being at capacity during peak hours. In the morning it regularly already takes 40 minutes or more to travel the three miles from my home to join the M25. Highways England has no plans to look at improving the A3 before 2020 and even then it is doubtful if those plans will be sufficient. It is therefore not sustainable to identify sites for further development which will worsen the congestion on these motorways and trunk roads.

2. **Congestion on the local village roads and lanes**
   Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. Send Marsh Road is already a rat run with constant traffic using it as a cut through. I object to further development which will cause greater congestion in and around our villages.

3. **Unsuitability of our local roads for heavy vehicles and more traffic**
   Many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.
4. Lack of proper infrastructure planning for sites
I object to the lack of planning and implementation of infrastructure. For example at Garlick’s Arch. Without improvements to the infrastructure prior to development, the existing residents’ quality of life will significantly deteriorate in many ways. We already struggle to get doctors appointments and the local schools are already struggling.

5. Lack of Utilities Capacity
Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. I object to the development of Garlick’s Arch on the ground that there is little capacity in these networks.

6. Sites being planned in unsustainable locations
Many of the strategic sites e.g. Wisley Airfield and Garlick’s Arch, are in unsustainable locations. They do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. I object on the grounds that these sites are not sustainable.

7. Parking issues in local villages caused by larger population
Many of the affected villages, such as Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems. To which I object.

8. Local healthcare facilities will be overwhelmed
Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. I object due to the further stress it will put upon existing health services.

9. Local policing facilities will be overwhelmed
Police services are seeing funding reduced. The development of the likes of Garlick’s Arch and Wisley Airfield will stretch the police services further and I object.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/47  Respondent: 15099265 / Andrew Crawford  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to lodge my strong objection to the Guildford Local Plan 2016.

1. Failure to protect the Green Belt
I object to the proposals to remove Ripley, Send and Clandon from the Greenbelt. There are no special circumstances to do this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/48  Respondent: 15099265 / Andrew Crawford  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **Disproportionate size of sites in relation to rural locations**
   I object to the allocation of land to the strategic sites of Wisley Airfield, Garlicks Arch (Ripley/Send border) and Gosden Hill (Clandon). The proposed development of these sites will have a disproportionate and permenant impact on the surrounding local villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/64</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **Unbalanced allocation of development in one area of the Borough**
   Between the M25 and Burpham, a distance of only about 5 miles it is proposed that over 6,500 houses are built. This represents over 40% of the housing proposed in the Local Plan. I object to this area being hit so hard by the allocation of development, which is disproportionate to the rest of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. Under Policy A43 you are proposing an additional 400 houses and 7,000sqm of industrial/warehousing. I object to this on the following grounds; this site is new and was not included in the Reg 18 draft so has not been consulted on previously (see 1. above), the land is Green Belt and as such is permanently protected by the NPPF which prevents the merging of settlements, the 7,000sqm of industrial space is not required since the latest ELNA shows a reduction of 80% in required employment floor space since the previous draft plan and 485 new house would create additional demand on the local school which has not got the capacity to cope.

1. Under Policy A43 you are proposing a new interchange for the A3. I object to this on the grounds that this would create an unacceptable increase in volume of traffic coming onto the A247 and through Send. It would inevitably result in the junction becoming the chosen route for traffic coming from the south on the M25 wanting to access Woking and the village and roads could not cope with this increased volume.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/65  Respondent: 15099489 / Christine Vinten  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Under Policy A44 you are proposing 40 new homes and 2 traveller pitches. I object to this on the following grounds; this site is new and was not included in the Reg 18 draft so has not been consulted on previously, the land is Green Belt and not appropriate for housing development and the subsoil of the site contains documented unsafe land fill waste which is currently vented.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/53  Respondent: 15099489 / Christine Vinten  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. Under Policy P2 you are proposing that Send should be removed from the Green Belt. I object to this on the
grounds that Send provides a needed buffer between Woking and Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I am writing to object to certain aspects of the local plan that GBC approved on 24th May. I understand that there is a six
week consultation period and I would be grateful if you could ensure my comments are put forward to the Inspector.

1. The GBC have not followed the correct process following significant changes from the 2014 proposals. I believe
that these require a full consultation under Reg 18 and that by using Reg 19 the whole process is invalidated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>pslp172/1831</th>
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Clockbarn Nursery Tannery Policy A42

I object to the change to Policy A42 because this shows a 1/3 increase in the number of homes and ignores the previous
objections raised by local people. This will worsen traffic problems along Tannery Lane and the junction with the A247.
Further erosion of the Green Belt is unwarranted and this will impact the countryside views from the Wey Navigation
canal/river.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | pslp172/1832 | Respondent: 15099489 / Christine Vinten | Agent: |
**Land at Garlick’s Arch, Send Marsh, Policy A43**

I object to the change to Policy A43 because it ignores the thousands of objections made by local people. These changes will cause over development of the village and the number of homes is excessive. It will create a join between Ripley and Send which defeats the purpose of the Green Belt and there are no exceptional circumstances to justify the undermining of this beautiful and permanent Green Belt area which includes woodland dating back to Tudor times. This change will generate excessive traffic blocking up the local roads of Send and Ripley. There is also no proven demand for the Travelling Show people plots proposed for this location.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Land at Burnt Common, London Road Policy A58**

I object to Policy A58 because it was deleted from the 2014 draft reflecting the objections that had previously been made. Also the word ‘minimum’ is a change from the word ‘maximum’ used in the 2016 draft and since that time there has been a decline in demand for industrial land. I do not believe there is a need to build industrial or warehouse development in a green belt area when both Slyfield and Guildford have empty sites. The 2017 Employment Land Need Assessment shows a reduction of demand of 3.9 hectares across the borough which shows the increase of 10 hectares in Send is completely unjustified. This development will have adverse effect on traffic volumes in local roads. The development will join up existing villages thus defeating the purpose of the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Green Belt, Policy 2 at paragraph 4.3.15**

I object to the proposal to inset Send Business Park from the Green Belt because it is an old non-conforming user in an area of outstanding countryside adjacent to the river Wey navigation. The roads are highly restricted for vehicle access on Tannery Lane in both directions. Development here would detract from the openness of the Green Belt and is inappropriate.

Please can you ensure my objections above are submitted as part of the Local Plan Consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/54  **Respondent:** 15099649 / David Powell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Unambitious proposals:

1) No provision for international airport to supplement Heathrow and Gatwick;
2) No rapid rail link to airports and city centres;
3) Increase lanes on M25 and A3 to six in each direction;
4) Provision of nuclear power station for recharging of battery powered vehicles;
5) Build a city in the sky: skyscraper homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/22  **Respondent:** 15099681 / David Strudwick  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write with reference to GBC’s draft plan and specifically to Policy numbers A42, A43, A43a and A44.

I object to the proposal to remove Send from the Green belt and would like to draw your attention to the Planning Practise Guidance document which clearly outlines the importance of the existence of Green Belt and even more importantly the protection of this invaluable facility.

Green Belt is there for very good reasons and it is grossly irresponsible for the council to even consider diminishing the protection to the environment, Surrey’s outstanding countryside and wildlife that this historic benefit offers the populace of the county.

I object to the councils proposals to develop the sites proposed in and around Send or he following reasons

The development will severely detrimentally diminish the effect of the Green Belt in which is a vital area of countryside. Send provides the required buffer between Woking and Guildford and to erode that will ultimately help in the destruction of valuable countryside in the immediate vicinity of the Surrey Hills, on of the Country’s areas of outstanding beauty and something that we all should be striving to protect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/68  Respondent: 15099681 / David Strudwick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

With regards to the development of Garlicks Arch and the destruction of open countryside to facilitate even more housing and industrial premises I object to what is clearly madness on the part of GBC.

Send and Old Woking already are subjected to ever growing levels of traffic and to develop this area along with the provision of a 4 way slip for the A3 will compound this. There is brown site land available in current industrial locations such as Slyfield to satisfy the councils desired development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/69  Respondent: 15099681 / David Strudwick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44
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I also object to the development of the land in Send Hill. This is the most inappropriate location for extra housing. Send Hill is a narrow residential road most unsuited to extra development. The road is used by local children to walk to school or to the bus stop for the George Abbott School bus. Being a straight road with no pavements extra traffic would put children at risk. The proposed site is vented landfill and as such I would think entirely unsuited to housing development.

Send Hill is home to one or more colonies of bats. Future development would put these protected species at risk.

Development of Send Hill was not in the council’s draft and has not been consulted upon. It should be removed from the Local Plan on this alone.

The residents of Surry are continually bombarded by the council’s cynical and sometimes underhand attempts to undermine the standard of living in this beautiful county. I lived in Knaphill where Farmland was destroyed to build housing at Brookwood farm. At the same time Surry County Council published adverts championing the council’s obligation the protect farm land. We are faced with the same thing now in Send. Green belt land is for a reason and it is time that the council took notice of it and stood to protect it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/70  Respondent: 15099745 / Duncan Vinten  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

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<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
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1. Under Policy A43 you are proposing an additional 400 houses and 7,000sqm of industrial/warehousing. I object to this on the following grounds; this site is new and was not included in the Reg 18 draft so has not been consulted on previously (see 1. above), the land is Green Belt and as such is permanently protected by the NPPF which prevents the merging of settlements, the 7,000sqm of industrial space is not required since the latest ELNA shows a reduction of 80% in required employment floor space since the previous draft plan and 485 new house would create additional demand on the local school which has not got the capacity to cope.

1. Under Policy A43 you are proposing a new interchange for the A3. I object to this on the grounds that this would create an unacceptable increase in volume of traffic coming onto the A247 and through Send. It would inevitably result in the junction becoming the chosen route for traffic coming from the south on the M25 wanting to access Woking and the village and roads could not cope with this increased volume.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<td>1. Under Policy A44 you are proposing 40 new homes and 2 traveller pitches. I object to this on the following grounds; this site is new and was not included in the Reg 18 draft so has not been consulted on previously, the land is Green Belt and not appropriate for housing development and the subsoil of the site contains documented unsafe land fill waste which is currently vented.</td>
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<td>1. Under Policy P2 you are proposing that Send should be removed from the Green Belt. I object to this on the grounds that Send provides a needed buffer between Woking and Guildford.</td>
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I am writing to object to certain aspects of the local plan that GBC approved on 24th May. I understand that there is a six week consultation period and I would be grateful if you could ensure my comments are put forward to the Inspector.

1. The GBC have not followed the correct process following significant changes from the 2014 proposals. I believe that these require a full consultation under Reg 18 and that by using Reg 19 the whole process is invalidated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Clockbarn Nursery Tannery Policy A42

I object to the change to Policy A42 because this shows a 1/3 increase in the number of homes and ignores the previous objections raised by local people. This will worsen traffic problems along Tannery Lane and the junction with the A247. Further erosion of the Green Belt is unwarranted and this will impact the countryside views from the Wey Navigation canal/river.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Land at Garlick’s Arch, Send Marsh, Policy A43

I object to the change to Policy A43 because its ignores the thousands of objections made by local people. These changes will cause over development of the village and the number of homes is excessive. It will create a join between Ripley and Send which defeats the purpose of the Green Belt and there are no exceptional circumstances to justify the undermining of this beautiful and permanent Green Belt area which includes woodland dating back to Tudor times. This change will generate excessive traffic blocking up the local roads of Send and Ripley. There is also no proven demand for the Travelling Show people plots proposed for this location.
Land at Burnt Common, London Road Policy A58

I object to Policy A58 because it was deleted from the 2014 draft reflecting the objections that had previously been made. Also the word ‘minimum’ is a change from the word ‘maximum’ used in the 2016 draft and since that time there has been a decline in demand for industrial land. I do not believe there is a need to build industrial or warehouse development in a green belt area when both Slyfield and Guildford have empty sites. The 2017 Employment Land Need Assessment shows a reduction of demand of 3.9 hectares across the borough which shows the increase of 10 hectares in Send is completely unjustified. This development will have adverse effect on traffic volumes in local roads. The development will join up existing villages thus defeating the purpose of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/75  Respondent: 15100385 / Emma Gibbs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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_strongly object_to POLICY A44. 1.9ha LAND WEST OF WINDS RIDGE AND SEND HILL for the reasons listed below.

1. Our children would feel unsafe [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]
2. At the bottom of Send Hill is a school, with the extra traffic this would become a potential danger zone to the children of the school and the local community.
3. Crime would potentially soar in the village putting extra burden on the already overstretched public services, for instance, the police, hospital/ambulance service and the fire station.
4. We would not feel safe in our own homes anymore.
5. [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]
6. Send Hill has a small road that is restrictive at the best of times and with the additional flow of traffic and the current infrastructure this would put heavy strain on this area
7. [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it.]
   [Summary of redacted paragraph: proposal has the potential to increase tension between the traveller and non-traveller community, which would result in social, economic and environmental impacts]
8. This site is a land fill site and has unknown waste buried underneath it, digging this up would raise health and safety concerns within the Send community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/82  Respondent: 15101793 / Julia Goddard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Object to the 2016 Draft for Building Houses in Garlicks Arch Ripley mainly as I live around that area and it will have a negative impact on traffic going through and getting held up on Burnt Common Lane.

I like to walk my dogs around there. It is lovely to have our green belt and the wildlife needs to feel safe and able to remain there.

I Object to all Erosion of the green belt which would include Clandon building of houses and Send and Burpham, Ripley, Wisley. The negative effect it will have on car pollution and green peace and devastating traffic chaos across the region.

I object to the removal of any villages such as Send, Clandon, Ripley, Wisley. These are my key areas which I feel strongly about and adore the walks around the countryside with my two dogs.

I object to the limited consultation Period of all of this going ahead

I object to the houses being built in Send, Wisley, Ripley, Burpham, Clandon with no or little evidence for the alleged housing need numbers.

I object to the lack of immediate provision for new schools. if we remain the same then there will not be a huge demand on NHS or Schooling needs.

I object to the lack of any immediate provision for doctors surgeries in Send or Ripley area.

I object to Garlicks Arch and the new roundabout system that will be developed to handle all the traffic, the Ripley Bypass already struggles when the M25 gets blocked, so this would be ridiculous and not work.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Object to the 2016 draft for building houses in Wisley, Clandon and Send.

I live just across from Garlicks arch and I go to London from Clandon Station

At this minute in time these areas cant hold so much traffic and it is not sustainable to allow all the opposed housing to go ahead.

The Ramp for the A3 will have dramatic implications.

I object to the Erosion of all Green belt in the areas of Garlick Arch, Wisley, Clandon, and Send

I object to Limited Consultation Period

My daughter will be going to Clandon School and I object to the number of houses being built.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/85  Respondent: 15101793 / Julia Goddard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Object to the 2016 draft for building houses in Wisley, Clandon, Send. I would like to enjoy my childhood of being able to roam about the countryside without the negative impact of large numbers of housing being built. I would like to learn about nature and wildlife and sustain what we have in these areas. Greenbelt is very important to me in the areas of Wisley, Clandon, Burpham. Garlicks arch is just across from where I live and I enjoy walking my dogs there. I am going to Clandon School and I object to the houses being built there.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/28  Respondent: 15102049 / Malcolm Holland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please note I object to the following:

1. GBC have not followed correct process full consultation is required under Regulation 18.
2. Evidence GBC have failed to provide sound accurate evidence in terms of Employment Land Needs
3. Policy p2 Send should not be removed from Green Belt
4. Policy A43 .30ha Land at Garlick`Arch Burnt Common There is no need for more houses on top of 13860 already proposed
5. Policy A44.1.9 ha Land west of winds ridge and Send Hill . This site is new and was not included in regulation 18 draft and has not been consulted upon previously. This will cause additional dangerous road traffic due to the
very narrow width single track local roads. This area around Potters Lane is already a highly dangerous road accident area and the extra housing etc will only add to this resulting serious road death accidents. Will you be able to live with this as persons making decisions resulting in death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/35  Respondent: 15102049 / Malcolm Holland  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt Policy 2 par 4.3.15

1, highly restricted road access

2, more to detract for the green belt ideas

3 it effectively an old non conforming user in area an area of outstanding country side

Finally all the ideas create more traffic for a road structure that will not be able to cope and will therefore in time cost more money for the council to solve. In addition you will be causing more people to be hospitalised because of the extra traffic pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/358  Respondent: 15102049 / Malcolm Holland  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A42 because

1, previous objections ignored

2, increase in homes to much

3, increase traffic problems
4, reduction in the green belt
5, increased flooding problems

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/359  Respondent: 15102049 / Malcolm Holland  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A43 because
1, ignores previous objections
2, it is permanent green belt
3, total over development of already developed village
4, ancient woodland that should be persevered
5 joins two villages and defeats green belt purpose
6, more flooding
7, contaminated with lead shot
8, extra traffic for which local road not built for

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/360  Respondent: 15102049 / Malcolm Holland  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy A58

1. originally deleted because of previous objections
2. industrial land in decline
3. space still available slyfied and other guildford industrial sites
4. reduction in demand for whole borough to 3.9 hectares whereas this proposal is for 10
5. again traffic problems more heath problems due to the car fumes
6. joining two villages in green belt area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/30  Respondent: 15102209 / Martin Manktelow  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Insetting the settlement boundary at both the St Bedes School site and the Wey Navigation at Send Road is totally unreasonable. This change would remove both areas from the Green Belt and render it open to permitting even more development in the village.

The land adjacent to Heath Drive is also part of the Wey Navigation Corridor. It is currently home to a great deal of wildlife. Fox, deer, badgers, owls and many other birds are found here on a frequent basis. The pleasant views when cruising on the Navigation will be totally lost if this change takes place.

The land at St Bedes School off of Bush Lane will be prime development land if this is allowed to happen. Again a valuable piece of Green Belt is involved here. A footpath runs through and allows the sight of nature in the wild. Buzzards, Kites, Skylarks and many other species along with deer, foxes etc., can be seen here. The time expired Junior school is currently being rebuilt on a nearby site and the current Junior school plan states it is to be returned to a green field. There is no exceptional reason for this to be changed.

I object strongly that these sites have been included in the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/86  Respondent: 15102209 / Martin Manktelow  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43 This particular site is set partly on farmed land and part in ancient woodland which is used for many country pursuits such as shooting, clay pigeon shooting and dog walking.

The land abuts the East Clandon Stream which floods most winters. The land is bordered on one side by the A3 and this very busy road would not make a good neighbour. The proposal is to place 400 houses on one part of the land and a range of industrial buildings to be placed on the rest. Furthermore, with so many buildings being added the run off the land onto the stream will be aggravated. I understand that the site is built on London Clay. This means that every time there is the potential for the stream to raise, the land floods. In addition the trees that are being removed will also exacerbate the problem. The copse is home to and regular visiting place for deer, foxes, owls, bats rabbits, hares not to mention a carpet of bluebells in spring

The wooded part of this land contains ancient oaks. Many of these oaks are hundreds of years old. The land is bordered on other sides by Kiln Lane and Burnt Common Lane, both are narrow residential lanes and totally unsuitable for large amounts of traffic. Both lanes exit onto the B2215 Portsmouth Road. This road is a feeder road to the A3 and M25 which is heavily congested both night and morning.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/87  Respondent: 15102209 / Martin Manktelow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43a This policy relates to a four way junction giving North and South bound entrances and exits to the A3. Whilst many local people would welcome easier access to the A3, the local feeder roads are all narrow and already congested. The Clandon Road A247 is again already heavily congested night and morning. When the road reaches the village of West Clandon where it becomes The Street, it narrows down even further. It is totally unsuitable as an access to the A3.

The Northbound access would run over a piece of Manorial land owned by the Manor of Dedswell and Papworth, surely such land should be preserved.

The implications for traffic are dramatic. Every day Portsmouth Road is stacked back from the M25 to the Send traffic lights on the A247 from 8.00am to about 9.15am every day and then the flow is reversed in the evening. As there are no improvement planned for the A247 and other surrounding feeder roads this is an unsuitable change.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy A44 Land to the west of Winds ridge and Send Hill

It is proposed to build forty houses and two traveller pitches.

This land is predominantly an infilled sand and gravel pit. It was filled over several years and still has venting points. The land is now partly farmed and grazed. It is a beautiful site which affords distant view from Potters Lane, Send. These lovely views would be totally altered. From the Send Hill side footpath there are distant views of the Surrey Hills. It probably represents backland development.

Send Hill is a very narrow lane and access to a small estate would be unsuitable. The site is not a sensible place for traveller pitches either as the access would be even worse for long vehicles. It is a mile from the village shops and bus stops.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

OBJECTION

My name is [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998].

Whilst I accept that every village has to grow and evolve, the proposals for Send Village are enormous and far reaching. Until about 10 days before the proposed Local Plan was launched the proposals for Send Village were comparatively low and with a few exceptions could possibly have been supported. However, as stated, 10 days before the approval a site was withdrawn and another, Garlick’s Arch (Policy 43a) was substituted. This adjusted the number of proposed houses from 185 to 485. The manner in which this Plan was inserted at a meeting at Guildford Borough Council which I attended was run in an appalling way. The Councillors who objected were belittled and laughed at by the Lead Councillor and the Mayor.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the above as the amount of homes has increased and there were already too many, taking into account the worsening of traffic in Tannery Lane and on the A247 junction with it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the above as the number of homes is excessive and will cause over development of the village, doing away with the space between Ripley and Send. There is no demand for traveller sites here and will tear up beautiful and ancient woodland, which cannot be replaced.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the policy of inserting send business park from green belt because the access is very restricted in Tannery lane and an increase of development would only increase traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My question is, "Why does your own planning committee not adhere to the aims of your own plan?" I refer specifically to a previous planning application 10/P/01451 whereby the planning committee agreed that it was important to retain existing employment land and furthermore to maintain distance between employment land and residential areas. Of course local residents thought that this was the right decision. However, later on, planning applications 14/P/01028 and 14/P/01029 called for two detached houses to be built within two metres of an industrial workshop and courtyard area. The planning committee saw fit to pass these applications and thereby go against their previous decision and against numerous points raised in your own local plan: 1/ Loss of existing employment land. 2/ Failure to provide land for new start-up businesses 3/ Your own plan states that it is important to retain land for manufacturing. The land that has been lost in this planning application has never been residential. It has been industrial since the second world war.

So, what is the point of having a local plan if your planning committee follows their own agenda?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/92</th>
<th>Respondent:</th>
<th>15103873 / Paul Johnston</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am emailing you to say that I strongly object to Policy A43 and A43a.

As a resident in Burntcommon I feel that these would be disastrous to the local area. In addition to destroying a beautiful green belt area it would bring significantly increased traffic volumes to an already stretched local road network.
In my view Policy A43a is absolute insanity and would significantly impact the traffic volume past my house and through the village of Send to an untenable level. If a traffic assessment report has been completed showing the predicted impact on the local road network I would be grateful if you could send it to me.

Please ensure that my comments are seen by the Planning Inspector

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/34</th>
<th>Respondent: 15104673 / Robert Morley</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the lack of any evidence for the alleged housing need numbers I object to the lack of immediate provision of new schools I object to the lack of any immediate provision for doctors surgeries</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>Please accept the following reasons why I object to the 2016 draft local plan; I object to all erosion of the Green belt I object to any &quot;insetting (ie removal) of any villages from the green belt</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate amount of development in one area of the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/109  Respondent: 15104673 / Robert Morley  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the limited consultation period I object to the last minute inclusion of new sites with less than 2 weeks notice

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/37  Respondent: 15104769 / Simon Crane  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a resident of Send Marsh Green for over 30 years I wish to register my objection to the plan to add 485 new houses and traveller pitches in the Send Ward.

I object to the increase in housing in the area. This will cause a huge increase to local traffic, making travel more congested and stressful. Also schools are already at bursting point locally, you will not to be able to allocate places to all the new children that will be moving in without increasing spending.

Similarly, local GP surgeries will not cope with the population increase – it’s hard enough getting a convenient appointment already…..
I also object to Send being removed from the Green Belt. This means that more developments could (and I am sure would) follow, adding to the problems mentioned above.

For your records, my address is [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

Please ensure my comments are seen by the Inspector and send me a personal response.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3529  Respondent: 15104897 / Terence Waters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A35 for the following reasons:

1. The sheer size and density of the development is quite out of proportion to the local area. East Horsley has several hundred less houses and occupies an area of around six times as great.

2. The housing in the development will, inevitably, be completely out of character with the surrounding villages. These have been around for hundreds of years and grown organically. New houses have tended to be built singularly or small multiple units and therefore, over time, have fitted in - but a new 2,000-house estate in this setting is, frankly, a ridiculous suggestion.

3. The local roads are unable to cope with the existing traffic. Ockham Road North and South are narrow and windy, with only one pavement in some places which is often just 2-foot wide and which at times vehicles need to mount for large vehicles to pass in the opposite direction. The additional traffic generated by the new development will exacerbate an already intolerably dangerous situation.

4. The transport requirements of residents of the new development can only be met primarily by private cars and the existing train stations of Horsley and Effingham Junction. The junction between the Ripley roundabout and the A3 heading northbound is already crowded with cars during the rush hour - adding more cars with lengthen the delays currently faced. And is it sensible to have a development built so close to the A3 with all the emissions generated currently to which greater delays will only add? The car parks at the two stations are already close to capacity - last winter when I went to Horsley Station at 10.00am there were only six available spaces. Where I live, about a mile from the station, there is a layby next to the side of my property which is used by the customers of the local butcher, Connisbees and I already see cars parked there all day with the owners walking down to the station. If the car park becomes full, so will the layby and then we'll have cars parking on Ockham Road itself creating even more traffic problems.

5. The additional population created by the development is likely to be between 5-6,000 including perhaps 6-800 children of school age. There are not the medical or educational facilities available to cope with this sudden influx.
1. And perhaps most important of all the plan contravenes the Green Belt regulations in that the requirement for the development does not meet the "special circumstances" set out.

For all these reasons I object to Policy A35 and trust the Council will remove the Wisley Airfield site from the local plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>SQLP16/110</th>
<th>Respondent:</th>
<th>15104929 / Lauren Stafford</th>
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<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** (No)

I object to the new housing estate near burnt common. The traffic through Send and Ripley is dreadful already and more houses with an average of 2 cars per household will make this worse. We will see an increase in pollution in the village, not great when there is a school on the main road in Send.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
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<th>Comment ID:</th>
<th>PSLPS16/98</th>
<th>Respondent:</th>
<th>15105057 / Phil Wicks</th>
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<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

The proposal to build 2000 homes on the site of Gosden Hill farm is disgraceful. The removal of this green belt land is unacceptable, will put a massive strain on an already overworked infrastructure and remove green open land from future generations. This site alongside the A3 is totally unsuited to housing development. I will fight the planning decision to build on this land and ruin this location to the east of Guildford. This is not a suitable answer to the need for new housing. I urge the planners to reconsider this decision and remove this location from the plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
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<tr>
<th>Comment ID: PSLP16/97  Respondent: 15105089 / Theresa McKeague  Agent:</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
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<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong></td>
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<tr>
<td>I object to the building of houses on what was a landfill site.</td>
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<tr>
<td>I object because I paid high price for my property to have an open aspect overlooking green belt land.</td>
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<tr>
<td>I object because it will devalue my property.</td>
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<tr>
<td>I object to having traveller pitches in a well established good residential area.</td>
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<tr>
<td>I object because of increased traffic on a narrow road with no footpaths and limited lighting.</td>
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<tr>
<td>I object because of the increased population where the gp surgery and local schools are already stretched to the limit.</td>
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<tr>
<td>I object because I feel that the Un-necessary use of green belt land where there are brown sites that should be used.</td>
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<tr>
<td>I object because this site is new and was not included in the regulation 18 draft and has not been consulted upon previously.</td>
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<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Attached documents:</strong></td>
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<th>Comment ID: PSLPP16/111  Respondent: 15105729 / Reata Hancock  Agent:</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong></td>
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<tr>
<td>I am writing to express my objections to the ill thought out planning proposals for the area in which I live and for a much larger area which includes erosion of the green belt. There is no apparent thought to provision of schools, surgeries and general amenities for the large surge in population which will result not to mention the fact that the present roads will not support the huge increase in traffic. The disregard for the importance of the green belt is beyond belief and the proposed amount of development in one area seems ridiculous. The limited time for consultation has been quite inadequate and I can only hope that someone will consider these objections before proceeding with the proposed plans.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<th>Comment ID: PSLPP16/113  Respondent: 15105793 / David Clue  Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy H3</td>
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</table>

Page 2121 of 2855
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object to the building of houses on Wisley Airfield, Garlicks Arch in Ripley/Send and Golden Hill in Clandon this will have a massive impact on these villages.

Please give a thought to how you would feel if you lived in one of these areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/112  Respondent: 15105793 / David Clue  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I totally object to Ripley Send and Clandon being removed from the green belt it would spoil the lives of people who live in these villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3384  Respondent: 15106593 / Louise Clark  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Finally, you cannot expect an area and infrastructure such as the A3 and Junction 10 of the M25 to keep taking traffic from Surrey and the South:

The A3 backs up Northbound at the M25 for miles each morning
The A3 also backs up Northbound approaching Guildford (cathedral hill) in the morning.
The A3 is choked with 2-3 mile gridlocks every evening with return traffic around Guildford Bypass
The A31 is gridlocked trying to join the A3 from close to Farnham (4-5 miles) every morning. The A247 is gridlocked through Send approaching the Burntcommon roundabout every morning. Ripley High Street is gridlocked at both rush hours at the Pyrford Lane junction.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPS16/104</th>
<th>Respondent: 15106593 / Louise Clark</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the proposed planning at Garlicks Arch for the building of houses. This is an unspoilt wildlife area with horses, deer, rabbits etc, streams and an allotment area. It would create an enormous amount of traffic, therefore blocking roads and transforming this peaceful village.

Please do not let this go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPS16/6567</th>
<th>Respondent: 15106593 / Louise Clark</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to building 400 houses and 7000sq metres of industrial space at Garlicks Arch. The site is ancient woodland with many wild animals, including bats, deer, red kites, badgers, pheasants. The site would not make a clean environment for residents with ever-growing pollution from the already over-used A3. It is covered by electrical pylons and cables. The A3 is already choked most of the day with traffic approaching the M25 and in the evening around the A3 Guildford bypass. The local infrastructure cannot support this and there are other areas that would suit development better with a totally new junction onto the M25 required.

Industrial space should be extended at Slyfield which is already deemed INDUSTRIAL! Brownfield sites should be better utilised.
I object to a new interchange with the A3 at Burntcommon because Send and Ripley would need to take traffic from all new developments in the area, namely any at Wisley, Gosden Hill or Burpham plus traffic from Woking and surrounding areas will further choke and gridlock Send and Ripley.

Again, the site would not make a clean environment for residents with ever-growing pollution from the already over-used A3.

The A3 is already choked most of the day with traffic approaching the M25 and in the evening around the A3 Guildford bypass. The local infrastructure cannot support this and there are other areas that would suit development better with a totally new junction onto the M25 required.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the development of 40 houses and 2 travellers' pitches at Send Hill. Disturbance of the documented 'unsafe' landfill waste within the subsoil (registered at Guildford B C) is an environmental hazard. Again, the area has outstanding beauty and is wholly unsuitable for development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</th>
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<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ( )</strong></td>
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<tr>
<td><strong>I object</strong> to Send village being removed from the Green Belt on the basis that it was intended that this would be permanent as required by the national Planning Policy Framework. The Green Belt prevents any joining of Woking &amp; Guildford in a large unwelcome and anti-social conurbation, removing essential natural landscape. Removal reneges on election promises and gives a free rein to developers for ever.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ( )</strong></td>
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<tr>
<td>1. I understand that Guildford borough council needs to provide more social and affordable housing, however i object to the large strategic developments at Wisley airfield, Garlicks arch and Gosden Hill as i fail to see what the requirement for large volumes of affordable and social housing is in the undeveloped areas of the borough where there is no employment, no transport and little services. It would be better to provide more affordable and social housing near developed areas where facilities, and employment opportunities are available and where people looking for affordable homes actually want to live.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ( )</strong></td>
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</table>
1. I object the the development of the strategic sites at Wisley Airfield, Garlicks arch and Gosden Hill as the road infrastructure does not have capacity to cope with large developments of the proposed scale. As a daily commuter i see that the A3/M25 junction is congested by 07:00 hours daily and in the evenings the entire M25 is congested between J16 and J10. Both the M25 and the A3 would need significant increase in capacity prior to the inclusion of the proposed strategic sites in any local plan.

2. I object to the inclusion of the Wisley airfield site and Garlicks Arch as strategic sites due to the congestion on local roads at all times of day. For instance it is often hard to pull out of my home onto the main road in Ripley due to a continual flow of traffic, adding more residents to the local area will result in a large increase in the number of accidents, especially as the roads are narrow.

3. I object to the Strategic sites as the road network that currently exists is barley maintained by the council, an increase in the traffic and number of HGVs using the roads will result in further deterioration. Many roads have large potholes on their perimeters meaning it is dangerous for two vehicles to pass in some places. Additionally there are limited cycle lanes and footpaths making it dangerous for pedestrians and cyclists on the roadways in the area.

1. I object to the inclusion of Wisley airfield and Garlicks Arch in the local plan due to them being in unsustainable locations regarding public transport. Neither location has a suitable train station located within realistic walking or cycling distance, this means only bus services and cars are feasible. Due to the large size of the sites its unrealistic to assume everyone will use the bus as it will not have capacity for the 200 homes at peak times unless 50 buses are to arrive in convoys to transport commuters. TO make these sites sustainable you must build a station and a branch line, or an overground tram similar to those used in Wimbledon at the developers cost, this would then also benefit existing local communities.

2. I object the the inclusion of the large strategic sites as insufficient parking will be provided, the village of Ripley already has problems with residents parking on pavements, there is not enough space to support additional vehicles which would be here. Additionally the parking at local stations is insufficient, a multistory car park would need building at each station to accommodate even one of the smaller proposed strategic sites.

3. I object to the local plan based on the strain this will put on Emergency services, a new hospital, fire station and policing facilities would need to be provided for so many new residents.

4. I object to inclusion of the strategic sites as i feel these would be detrimental to the environment in an already polluted area due to its proximity to M25 road network.

5. I object to the proposed strategic sites as i fail to see how these are in any way helpful to the needs of local residents, if you also fail to provide improvements to the transport network, and rail access for the many new commuters who will move to the area there are no benefits to existing residents that you represent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. As a keen runner I object the the inclusion of the Large strategic sites at Wisley airfield and Garlicks Arch due to the inevitable deterioration in air quality that will ensued.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/118  Respondent: 15106689 / Joseph Hine  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Local plan 2016 for the following reasons

1. I object to insetting of the local villages of Ripley, Send and Clandon from the Greenbelt. The purpose of the greenbelt is to prevent urban sprawl, as such removing the villages specifically those located between your identified strategic sites at Wisley airfield and Garlicks Arch would seem to be encouraging an urban sprawl directly damaging the integrity of the greenbelt. As these Strategic sites sandwich Ripley it would seem highly important for Ripley to remain washed over within the greenbelt to provide separation and identity to any proposed new developments and those existing at present.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/119  Respondent: 15106689 / Joseph Hine  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the overbearing size of the proposed developments at your strategic sites of Wisley airfield, Garlicks Arch and Gosden Hill as all of these sites are larger than the villages that are established and are proposed to act as hubs for new residents to use for facilities amenities and transport. I appreciate some development is required but it should be in proportion to surrounding established villages to complement and improve rather than to overshadow and swamp them. The sites proposed would be significantly overdeveloped.

2. I object to your allocation of a large portion of housing development within a small geographical area of the borough, the housing development should be based not only on a few large sites which are easier for developers to profit from but on smaller sites that can be scattered across the borough to distribute pressures on services and facilities evenly, the inclusion of a single large site should mean no other large sites are allowed within close
proximity due to the massive increase of traffic, density of housing and pressure on local infrastructure this will bring.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/114  Respondent: 15106689 / Joseph Hine  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the inclusion of the strategic site at Wisley airfield as this has recently been denied planning permission due to many of the above reasons, as such why is it to be included again, many of the reasons it was reject are not solvable due to its location and the nature of the site. Or is it the case that the council will allow development here regardless due to the revenue they can generate from council tax?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/113  Respondent: 15106689 / Joseph Hine  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Firstly i would like to express my irritation to only learn of the plan from a stall at Ripley farmers market, as the council is elected to represent all residents why are you not informing us about this plan openly and honestly to show the consultation with your constituents happens rather then treating it as an inconvenience to your proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/105  Respondent: 15106785 / Giles Puckle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the site at Garlick's Arch being developed on the grounds that this development is simply unsustainable. Living opposite the proposed site I am aware of the lack of local bus services, the lack of a railway station within a thirty minute walk and the lack of local infrastructure in terms of schools, doctors surgeries and shops. The proposed development of an additional 400 houses here will severely impact the lives of us local residents.

- Local police services, which are already seeing funding reduced are stretched now, so I object to the proposed development at Garlick's Arch and Wisley Airfield as it will stretch these resources even further.

I hope that common sense prevails and that all of the objections of local residents who care deeply about our community are listened to.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/124  Respondent: 15106785 / Giles Puckle  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the allocation of land to the strategic sites of Wisley Airfield, Garlicks Arch (Ripley/ Send border) and Gosden Hill (Clandon). Our local villages are unable to cope with these proposed extra homes and the local communities will be negatively impacted as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/125  Respondent: 15106785 / Giles Puckle  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
- I object to the lack of immediate provision for any new schools. My wife is currently expecting our first child and with a proposed extra 6,500 houses to be built between the M25 and Burpham, our local primary schools will be placed under even more pressure for places. Our children will potentially have to travel long distances to go to school which will affect their quality of life and add more traffic to our already congested roads.

- I object to further development as it will cause further congestion on our roads in and around our villages. The A3 and M25 are already at saturation point when I try and get to work during rush hour, our villages have long queues through them and parking spaces are virtually non-existent in Send and Ripley. Extra homes in the area will put further pressure on our roads and cause even more pollution in our area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/123  Respondent: 15106785 / Giles Puckle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My name is Mr. Puckle, my wife and I are the owners and residents of [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]. I would like to lodge my objections to the 2016 draft local plan for the following reasons:

- I object to removing Ripley, Send and Clandon from the Greenbelt. There are no special circumstances to remove these villages and once this beautiful greenbelt with beautiful woods and natural wildlife habitats has been lost it will never return.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/106  Respondent: 15106881 / Sarai Sinai  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We are writing to object to the proposed development at Garlicks Arch in Burnt Common policy A43. This proposal was added at very late notice after previously being assured by the council leader there would be no significant new changes to the DLP in Send. The use of regulation 19 further adds to the betrayal. This enormous new proposal must require a full consultation under regulation 19. The 2014 proposal for 430 houses was rightly reduced to 185 in April 2016. This late and hasty attempt to push through this plan increases the number to 485! A totally excessive and unneeded number based on inflated projections of population growth by GBC. The proposed light industrial units can easily be accommodated at Slyfield and the proposed 4 way junction to the A3 will cause traffic gridlock, noise and air pollution for local residents. All this without yet mentioning this 100 acre site is GREEN BELT (a word no longer found in the GBC's dictionary). With prime agricultural land, rare enough in Surrey, and ancient 16th century protected woodland within the boundary, this land must be saved. There is a brook running through the middle of the site essential for drainage and the area is prone to flooding already. The site prevents urban sprawl between Ripley and Send vitally important. The villages medical centre already extremely busy and local schools cannot cope with the 25% population growth this plan will bring to our village. We have received emails from relevant ministers and Sir Paul Beresford stating government policy is to protect the Green Belt and listen to local residents in these matters. Why does GBC neither protect or listen to those it is elected to represent. Conservative councillors ran for election on a protecting the Green Belt, now elected they stab us in the back.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/107  Respondent: 15106881 / Sarai Sinai  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Finally we also object to policy A44 West Ridge and Send hill. Again this site is new, not included in the regulation 18 draft and not previously consulted on. This is high quality Green Belt land. The subsoil of the site contains documented land fill waste and is vented, making it totally unsuitable for development. Access is completely insufficient.

Please reject these proposals they are unwanted, unnecessary and have zero local support.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/44  Respondent: 15106945 / Alisa Bowe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am a Ripley resident and I object to:

- all erosion of the Green Belt
- any “in-setting” of any villages from the Green Belt
- the disproportionate amount of development in one area of the Borough
- the limited consultation period
- the last minute inclusion of new sites with less than 2 weeks’ notice
- the lack of any evidence for the alleged housing need numbers
- the lack of immediate provision for new schools
- the lack of any immediate provision for Doctor’s Surgeries

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/45  Respondent: 15106977 / Y C Smithers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to advise that I object to the Final Draft Local Plan for Send Ward:

Clockbarn Nursery, Tannery Lane (Policy A42, page 220)

Land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (Policy A43, page 222)

Land for new north facing slip roads to/from A3 at Send Marsh/Burnt Common (Policy A43a, page 224)

Land west of Winds Ridge and Send Hill (Policy A44, page 226)

My husband and I have lived in Potters Lane, Send in excess of 25 years. My husband having originally grown up in Send, we chose to return to the village to enjoy our retirement. We have many family and friends living close by, including both my daughters and grandchildren, all of whom regularly visit us.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/57  Respondent: 15106977 / Y C Smithers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I am writing to advise that I object to the Final Draft Local Plan for Send Ward:

Clockbarn Nursery, Tannery Lane (Policy A42, page 220)
Land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (Policy A43, page 222)
Land for new north facing slip roads to/from A3 at Send Marsh/Burnt Common (Policy A43a, page 224)
Land west of Winds Ridge and Send Hill (Policy A44, page 226)

My parents have lived in Potters Lane, Send in excess of 25 years. My Dad having originally grown up in Send, my parents chose to return to the village to enjoy their retirement. My parents have many family and friends living close by, including myself, my sister and her children, and aunts and uncles. All of whom regularly visit my parents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/132  Respondent: 15106977 / Y C Smithers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The access road to Send Hill from Potters Lane is a narrow single track road and not suitable for 40 houses and 2 travellers sites. This junction is treacherous with no clear vision if you are coming from Send Hill into Potters Lane. With speeding motorists using Potters Lane as a cut through to and from the A3, any additional traffic will make this junction even more hazardous. Myself and my daughter narrowly missed being involved in an accident today on the bend heading from Potters Lane to the Send Hill turning – a large lorry and a Fiat 500 had been involved in an incident where the Fiat had been damaged by the lorry where the road is very narrow. The previous week I was nearly involved in a head on collision on the same bend with a lorry in the middle of the road as the lorry was too large for the narrow lane, resulting in the lorry leaving tyre skid marks which can be seen on the road. My daughter’s car has been damaged by a passing car coming from Send Hill, where her wing mirror was broken, and I have had the same experience, these are not isolated incidents as Send Hill and Potters lane are too narrow for the traffic using them. The proposed development would not be in keeping with the beautiful and peaceful surroundings of the area including the cemetery and the adjoining properties in Send Hill. I understand that the Send Hill Development was not part of any previous consultations and I am concerned about the impact of this level of development on residents and cemetery users.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/134  Respondent: 15106977 / Y C Smithers  Agent:
I also object to the plans for the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley, land for new north facing slip roads to/from A3 at Send Marsh/Burnt Common and Clockbarn Nursery, Tannery Lane. The infrastructure of Send Village is not able to cope with the existing daily traffic as it is, especially at peak times with commuters and school runs. Most days there is congestion along Send Road. My daughter worked in Ripley for six years and it regularly took her 50 minutes to travel from her house in Westfield to work during peak travel times. This was one of the reasons she chose to move jobs. There are no realistic alternative routes for motorists to take from Send Road and many cars chose to cut through Potters Lane to avoid sitting in traffic, many of which are large lorries who are too big for the road or speeding commuters in cars, which pose daily danger to the residents of Potters Lane, any increase in traffic will only add to the danger.

I would be grateful if you could pass my comments onto the Planning Inspector and confirm safe receipt of this email. I do hope you will take on board my feedback and the feedback of the residents of Send who very much care about the village and its surroundings and who have lived in the village for many years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the plans for the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley, land for new north facing slip roads to/from A3 at Send Marsh/Burnt Common and Clockbarn Nursery, Tannery Lane. The infrastructure of Send Village is not able to cope with the existing daily traffic as it is, especially at peak times with commuters and school runs. Most days there is congestion along Send Road. My daughter worked in Ripley for six years and it regularly took her 50 minutes to travel from her house in Westfield to work during peak travel times. This was one of the reasons she chose to move jobs. There are no realistic alternative routes for motorists to take from Send Road and many cars chose to cut through Potters Lane to avoid sitting in traffic, many of which are large lorries who are too big for the road or speeding commuters in cars, which pose daily danger to the residents of Potters Lane, any increase in traffic will only add to the danger.

I would be grateful if you could pass my comments onto the Planning Inspector and confirm safe receipt of this email. I do hope you will take on board my feedback and the feedback of the residents of Send who very much care about the village and its surroundings and who have lived in the village for many years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the plans for the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley, land for new north facing slip roads to/from A3 at Send Marsh/Burnt Common and Clockbarn Nursery, Tannery Lane. The infrastructure of Send Village is not able to cope with the existing daily traffic as it is, especially at peak times with commuters and school runs. Most days there is congestion along Send Road. My daughter worked in Ripley for six years and it regularly took her 50 minutes to travel from her house in Westfield to work during peak travel times. This was one of the reasons she chose to move jobs. There are no realistic alternative routes for motorists to take from Send Road and many cars chose to cut through Potters Lane to avoid sitting in traffic, many of which are large lorries who are too big for the road or speeding commuters in cars, which pose daily danger to the residents of Potters Lane, any increase in traffic will only add to the danger.

I would be grateful if you could pass my comments onto the Planning Inspector and confirm safe receipt of this email. I do hope you will take on board my feedback and the feedback of the residents of Send who very much care about the village and its surroundings and who have lived in the village for many years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
days there is congestion along Send Road. In the six years I worked in Ripley, it regularly took me 50 minutes to travel from my house in Westfield to work during peak travel times. This was one of the reasons I chose to move jobs. There are no realistic alternative routes for motorists to take from Send Road and many cars chose to cut through Potters Lane to avoid sitting in traffic, many of which are large lorries who are too big for the road or speeding commuters in cars, posing daily danger to the residents of Potters Lane, any increase in traffic will only add to the danger.

I would be grateful if you could pass my comments onto the Planning Inspector and confirm safe receipt of this email. I do hope you will take on board my feedback and the feedback of the residents of Send who very much care about the village and its surroundings and who have lived in the village for many years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp172/2512  Respondent: 15106977 / Y C Smithers  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Clockbarn Nursery, Tannery Lane, Policy A42

I object to the Policy A42 change at Clockbarn in Tannery Lane because the increase to 60 houses in place of 45 homes is not in keeping with the rural area and Tannery Lane is very narrow and is not sufficiently wide enough to carry the significant increase in traffic. It is already treacherous at points along the lane and it will impact the open countryside views and will unnecessarily erode the Green Belt status of the area. The Marina development has already been given the go ahead and the area cannot cope with more building development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3844  Respondent: 15106977 / Y C Smithers  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Clockbarn Nursery, Tannery Lane, Policy A42

I object to the Policy A42 change at Clockbarn in Tannery Lane because the increase to 60 houses in place of 45 homes is out of character and not in keeping with the rural setting. Tannery Lane is extremely narrow and not wide enough to carry significant increases in traffic. It is already dangerous along the lane and will impact the open countryside views and will unnecessarily erode the Green Belt status of the area. The Marina development has already been approved and the area will be saturated if there is more building development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2513  Respondent: 15106977 / Y C Smithers  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Land at Garlick’s Arch, Send Marsh, Policy A43

I object to the Policy A43 change at Garlick’s Arch to allow for 400 homes and 6 Travelling Showpeople plots. This proposal will over-develop our village as this number of houses is unduly excessive and will erode the ancient woodland that has existed for hundreds of years. Guildford Borough Council should be protecting this area not developing it. It will join up Ripley and Send villages and will erode the Green Belt further and generate excessive traffic and block the already gridlocked roads. The area is prone to flooding and this proposal will increase the likelihood of further flood damage. There is no demand for Travelling Showpeople plots in this area, and ‘no exceptional circumstances’ exist to destroy the Green Belt status of this location. There are others areas in the Borough available for development. This area is already full to capacity, the Doctors Surgery and schools are struggling to cope with existing volumes as it is.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Land at Garlick’s Arch, Send Marsh, Policy A43

I object to the Policy A43 change at Garlick’s Arch to allow for 400 homes and 6 Travelling Showpeople plots. This proposal will over-develop our village as this number of houses is unduly excessive and will destroy the ancient woodland that has existed for hundreds of years. Guildford Borough Council should be protecting this area not developing it. It will join up Ripley and Send villages and will erode the Green Belt further and generate excessive traffic and block the already gridlocked roads. The area is prone to flooding and this proposal will increase the likelihood of further flood damage. There is no demand for Travelling Showpeople plots in this area, and ‘no exceptional circumstances’ exist to destroy the Green Belt status of this location. There are others areas in the Borough available for development. This area is already full to capacity, the Doctors Surgery and schools are struggling to cope with existing volumes as it is.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Burnt Common, London Road, Policy A58

I object to Policy A58 at Burnt Common because it was deleted from the 2014 draft because of previous objections and there is no requirement in the area for a minimum of 7,000 sq m of industrial warehousing. It will impact the small surrounding roads as the traffic will be gridlocked, the Ripley exit off the A3 in both directions is already treacherous with cars speeding through the area to cut through Send and Ripley villages. There is no demand for industrial warehousing in this area when there are warehouses available and empty in Slyfield Green which is purpose built for industrial units. It will only erode the Green Belt further and join up Ripley and Send villages unnecessarily.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3846  Respondent: 15106977 / Y C Smithers  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Burnt Common, London Road, Policy A58

I object to Policy A58 at Burnt Common because it was deleted from the 2014 draft because of previous objections and there is no requirement in the area for a minimum of 7,000 sq m of industrial warehousing. It will impact the small surrounding roads, and the traffic will be gridlocked. The Ripley exit off the A3 in both directions is already treacherous with cars speeding through the village to cut through Send and Ripley. There is no demand for industrial warehousing in this area and there are warehouses in Slyfield Green which is purpose built for industrial use and are currently empty. It will erode the Green Belt further and join up Ripley and Send villages unnecessarily.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/934  Respondent: 15106977 / Y C Smithers  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposal to inset Send Business Park from the Green Belt because it is in a restricted vehicular access area along Tannery Lane from both directions and further expansion and development is not in keeping and will detract from the openness of the area. The existing infrastructure is not sufficient to cope with any increase in traffic and building development. It will seriously impact the area of outstanding building along the Wey Navigation, which my family and friends have enjoyed for many years.

My wife and I have lived in Send in excess of 24 years. I originally grew up in Send and we chose to return to the village to enjoy our retirement. We have family and friends living close by, including both my daughters and grandchildren, all of whom regularly visit us. The proposals above would considerably change the way of life in the village and surrounding area, along with many others chose to buy in Send because of its village environment and rural setting, away from built up areas. We live in Potters Lane and are impacted every day by commuters speeding through to and from the A3, both my wife and I and are family have had our cars damaged from cars speeding past and not keeping to their lane and clipping our cars.

I appreciate more housing is required but there are a number of brown fill land sites in the Borough on which to build. I strongly object to the Green Belt status being eroded away from Send Village. I do hope you will take my comments on board as our family very much care about Send village and its surrounding area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1958  Respondent: 15106977 / Y C Smithers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt, Policy 2 at Paragraph 4.3.15

I object to the proposal to inset Send Business Park from the Green Belt because it is in a restricted vehicular access area along Tannery Lane from both directions and further expansion and development is not in keeping and will detract from the natural beauty of the area. The existing infrastructure is not sufficient to cope with any increase in traffic and building development. It will seriously impact the area of outstanding building along the Wey Navigation, which our family and friends have enjoyed for many years.

My parents have lived in Send for over 24 years, my Dad having originally grown up in Send and my parents chose to return to the village to enjoy their retirement. The proposals above would considerably change the way of life in the village and surrounding area. My parents chose to buy in Send because of its village environment and rural setting, away from built up areas. My parents live in Potters Lane and are impacted every day by commuters speeding through to and from the A3, our family have all had our cars damaged from cars speeding past and not keeping to their lane and clipping our cars.

I appreciate more housing is required but there are a number of brown fill land sites in the Borough on which to build. I strongly object to the Green Belt status being eroded away from Send Village and I do hope you will take my comments on board as our family very much care about Send village and its surrounding area.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/46  Respondent: 15107041 / Andy Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to you to object to the changes to the Local Plan, especially the council's proposals to develop the land at Garlick's Arch at Burnt Common on the Send/Ripley borders for housing and industrial warehousing.

To summarise:

- I object to the erosion of the Green Belt in general
- I object to Ripley, Send and Clandon being removed from the Green Belt, this would cause destruction of our rural villages
- I object to the disproportionate amount of development being proposed, these are villages with defined boundaries that would disappear as a consequence of the proposals
- I object to the last minute inclusion of these proposals in the Local Plan with less than 2 weeks’ notice
- I object to the fact that no housing needs analysis has been produced and made available publicly, even affordable housing in these villages would be out of reach for the majority
- I object on the basis the infrastructure cannot accommodate the proposed development, there is no immediate provision for new schools, doctors surgeries etc.

I object, object, object…it’s a disgrace!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/212  Respondent: 15107041 / Andy Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Once again I am compelled to write to you to raise objections regarding the local plan. I find it exasperating that I continuously have to raise objections to a local plan which demonstrates an absolute failure of a proper planning process. You have not made any attempt to mitigate and or amend the plan despite the significant volume of objections to the 2016 plan. Indeed Guildford Borough Council has made the situation even worse by combining proposals around Garlick’s Arch and Burnt common and not altering the proposals based on previous objections.

I object to the proposals to build 400 homes and 6 travelling show people plots on the land at Garlick’s Arch, Send Marsh, Policy A43, for the following reasons:

- Thousands of objections have been raised on this previously, this is in complete disregard to all previous objections
- There is no evidence of a demand to house travelling show people in this location,[Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]
- The land is in the Green Belt and no exceptional circumstances exist
- The number of homes is excessive ensuring complete over development of the village. There would be no definition of villages between Ripley & Send defeating the purpose of the Green Belt
- Infrastructure cannot support this. Traffic and pollution levels are already a major problem, schools and medical facilities, as required by law, are already over stretched
- The land is an ancient woodland that existed back in the reign of Elizabeth 1
- The area is subject to frequent flooding and is currently a flood zone 2 allocation, drainage remains substandard
- Due to local shooting facilities, the land is contaminated by lead shot

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/213  Respondent: 15107041 / Andy Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposals to provide an allocation for a minimum of 7,000 sq m of industrial or warehousing on the land at Burnt Common, London Road, Policy A58, for the following reasons:

- This was deleted from the 2014 draft based on previous objections, why should it be resurfaced when there is no need to build industrial or warehouse space in the middle of the Green Belt? Guildford and Slyfield have empty sites and industrial units already, the requirement for more space does not exist
- Since the 2016 plan there has been a decline in demand for industrial land (as proven in the point above re: empty units)
- The 2017 employment land need assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares in Send in the Green Belt
- Infrastructure cannot support this. Traffic and pollution levels are already a major problem
- By joining up the villages there would be no definition between Ripley & Send defeating the purpose of the Green Belt
Yet again, having to write to raise objections to an ill-considered plan that has not been amended, despite the volume of previous objections, really demonstrates a lack of competence in this space. It is infuriating to local residents who yet again have to ‘go into battle’ with a local council that clearly is not listening to the community, it’s a complete disservice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT ESPECIALLY TO 6 POLICIES: A36, A37, A38, A39, A40 & A41:
• Amount of new housing far exceeds local need.
• Housing density excessive when compared with existing development.
• Would transform the Horsleys into a sizable town, something for which no case is made.
• No local support.
• Collective impact of these 6 sites on a small part of the borough not considered. Should not be treated as isolated, separate sites.
• Total amount of new building out of scale with the planned development elsewhere the borough, especially less sensitive urban areas not protected by Green Belt.
• Sites unsustainable. Key infrastructure lacking. No adequate provision is made to increase it – e.g. poor wastewater capacity, lack of schools, absence of traffic management plan, flooding.
• No account taken of additional impact of Wisley Airfield site on Horsleys.
• Extension of settlement boundaries too permissive. Horsleys characterised by streets with development along only one side of the road. Policies allow too many adjacent green fields to be developed by squaring off boundaries and claiming they don’t contribute to Green Belt “openness”.
• Green Belt gap with neighbouring settlements hugely narrowed, especially if Wisley Airfield is built on.
• Will harm compliance with NPPF 81 – e.g. by making cycling (including Prudential cycle races) too dangerous, ruining the rural setting of Waterloo Farm campsite, destroying the ambience of Grange Park Opera’s new “Theatre in the Woods”.
• Policy A40 especially unviable because of high water table and poor drainage, leading to regular winter flooding.
• Safe access and egress at Site A40 unachievable, owing to flooding, high speed limits, poor sight lines, narrow access to existing properties, inadequate pavements for elderly and schoolchildren, increasing use by recreational cyclists etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT ALSO TO POLICY A35 (WISLEY AIRFIELD):
• Should not be in the plan for all the reasons the Planning Committee rejected the identical recent proposal by Wisley Investment Properties.
• Irregularity of including this policy in the plan 24 hours before this planning application was rejected (like extending the time allowed for the developers to present their application).
• Unacceptable Conservative Party links between the developers and the Council.
• No Green Belt “exceptional circumstances” presented.
• Not a brownfield site as stated – only 15% of it.
• Proposed SCC waste site ignored.
• Loss of farming land.
• Too near RHS Wisley and Thames Basin Heath SPA.
• SANG would harm on SPA.
• Will aggravate traffic jams at A3 roundabout and M25 Junction 10.
• Unacceptable increase in air pollution.
• No existing public transport and stations miles away.
• No proper traffic data.
• Housing density far too great.
• Over 2,000 houses will swamp and destroy Ockham conservation area, with impact on listed buildings.
• Access confined to inadequate narrow lanes.
• Water table and surface water flooding not considered either for site itself or for downstream areas on River Mole.
• Major impact on neighbouring villages, especially Horsleys.
• No assessment made of collective impact on area of this and 6 Horsley sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
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<tr>
<th>Comment ID: PSLPP16/8942</th>
<th>Respondent: 15107297 / Ian McQuattie</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY D1 (BETTER PLACES):

- Poor monitoring.
- No force given to vernacular or historic design guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY D2 (SUSTAINABLE DESIGN ETC):

- Targets unachievable if Green Belt covered with amount of housing as proposed, causing traffic chaos, infrastructure failure and unacceptable levels of pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/8944</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO POLICY D3 (HISTORIC ENVIRONMENT):

- Supports overdevelopment: you can’t “enhance” history. Doesn’t ban private interests from trying to make aggressive profits from privatising, commercialising and Disneyfying public historic assets.
- Doesn’t ban development near historic assets.
- Ignores NPPF 126, 131, 132, 133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8946  Respondent: 15107297 / Ian McQuattie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY D4 (DEVELOPMENT IN URBAN AREAS AND INSET VILLAGES)

- No commitment to expand social housing or accommodation for people who can’t afford so-called affordable homes.
- Not enough new homes in urban areas, despite demand and need for urban regeneration and protection of Green Belt.
- Objectives for inset villages cancelled out by plans for excessive housing growth there.
- Too much emphasis on traditional shops, when a lot of this sector is in terminal decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8923  Respondent: 15107297 / Ian McQuattie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO POLICY E1 (EMPLOYMENT):

- Poor evidence base.
- Too much encouragement to low added-value employment that’s needed elsewhere in the country.
- Fails to concentrate general business activity in urban areas or business parks that have the infrastructure.
- Fails to differentiate this from appropriate rural business.
- Too much encouragement of warehousing, for which Guildford is too congested.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8925   Respondent: 15107297 / Ian McQuattie   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E3 (EMPLOYMENT CAPACITY AND FLOORSPACE):

Puts unnecessary obstacles in the way of using brownfield land into useful residential housing, contrary to government policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8927   Respondent: 15107297 / Ian McQuattie   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E4 (SURREY RESEARCH PARK):

- Subordinates public planning policy to the University of Surrey’s private, commercial enterprises (not its public academic purpose).
- No cost/benefit analysis of harm to Green Belt involved in extending research park.
- Waters down research purpose of park, turning into a general business park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<p>| Comment ID: PSLPP16/8929 Respondent: 15107297 / Ian McQuattie Agent: |</p>
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<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT TO POLICY E5 (RURAL ECONOMY):</td>
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<tr>
<td>• Incompatible with high housing numbers proposed for rural areas elsewhere in the plan.</td>
</tr>
<tr>
<td>• Inserting and settlement boundary extension endanger appropriate rural activities listed that depend on maintaining rural areas’ character.</td>
</tr>
<tr>
<td>• Town-centre uses for rural areas contradict government’s localism policy and need to consult and protect village environments.</td>
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<tr>
<td>• Established commitments to high-speed rural broadband and mobile coverage watered down despite 2014 consultation responses.</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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<p>| Comment ID: PSLPP16/8932 Respondent: 15107297 / Ian McQuattie Agent: |</p>
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<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6</th>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT TO POLICY E6 (LEISURE AND VISITOR EXPERIENCE):</td>
</tr>
<tr>
<td>• Danger of over development: success doesn’t depend on building “attractions” which can harm heritage and rural settings. No case made for creating new ones.</td>
</tr>
<tr>
<td>• No policy of opposing reduction in rural hotel capacity.</td>
</tr>
<tr>
<td>• No definition of what added value interventions by Council can make to normal visitor market mechanisms.</td>
</tr>
<tr>
<td>• No policy of supporting Guildford countryside as its prime leisure and visitor asset, whose value rises as London gets bigger and busier.</td>
</tr>
<tr>
<td>• No vision of what the ideal visitor experience of the borough actually is and how to support its various elements.</td>
</tr>
</tbody>
</table>
I OBJECT TO POLICY E7 (TOWN CENTRE):

- No statement in policy wording of value of Guildford’s rural setting and views.
- No consideration of Town Centre Master Plan, GVG proposals or station redevelopment plans.
- Proportion of new housing in town far too small. Development pushed into countryside, ruining the latter and harming urban regeneration.
- No brownfield register.
- Too much big retail, despite online shopping revolution and decline of traditional high streets internationally. Futile to try to turn Guildford into Woking or Kingston.
- No measures to support small, niche retailers in town, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT TO POLICY E8 (DISTRICT CENTRES):

- Too much scope to expand rural retail centres to justify major housing expansion across the countryside, despite lack of demand. Will spoil character of villages while harming Guildford’s role as a retail hub.
- No measures to support existing rural shops and services, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/8938  Respondent: 15107297 / Ian McQuattie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E9 (LOCAL CENTRES):

• No need for retail development “adjacent” to rural centres for same reason as Policy E8.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8909  Respondent: 15107297 / Ian McQuattie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY H1 (HOMES FOR ALL):

• Policy doesn’t set any constraints on building.
• Housing mix based on pre-Brexit growth and demographic assumptions and unreliable SHMA that wasn’t put out to formal public consultation and wasn’t scrutinised by Councillors.
• Fails to compel University of Surrey to use its thousands of planning permissions and existing space, such as car parks, for student accommodation.
• Lets University off the hook of accommodating all its students, so as to free up houses for the most needy in town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8911  Respondent: 15107297 / Ian McQuattie  Agent:
### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1 OBJECT TO POLICY H2 (AFFORDABLE HOMES):

- Using the official definition of Affordable is a joke. Affordable homes round here are not affordable! Pushing for these homes just means pushing for more development.
- The viability clause lets developers off the hook of providing even these (non-) affordable homes. Too open to manipulation.
- Contradicts government policy to develop less advantaged regions of the UK. People don’t have to live and work in Guildford but should be encouraged to move to cheaper, less congested areas.
- This policy won’t affect market forces or house prices. Guildford is too small and too near London to influence these, however many homes it builds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8913  Respondent: 15107297 / Ian McQuattie  Agent:

### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1 OBJECT TO POLICY H3 (RURAL EXCEPTION HOMES):

- It loosens the criteria by allowing “market housing” and development that changes the housing mix. Developers would be able to override NPPF “exceptional circumstances” and other restrictions to build large houses in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8948  Respondent: 15107297 / Ian McQuattie  Agent:

### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT TO POLICY I1 (INFRASTRUCTURE & DELIVERY)

- Infrastructure considered here as an afterthought, rather than pre-condition of development. Should be a key issue for the rest of the plan.
- Excessive housebuilding in countryside not supported by any funding or provision for infrastructure.
- Heavy focus on building on greenfield sites inefficient and unnecessary: cheap for developers but much more expensive for the public who have to fund the infrastructure.
- Draft CIL scale discourages use of brownfield land first.
- No plan for organic increase in existing traffic congestion, let alone once thousands of houses are built across the countryside. Local roads hardly considered. Green Belt being eroded before road widening/improvement plans certain, encouraging over-development of greenfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8950  Respondent: 15107297 / Ian McQuattie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY I2 (SUPPORTING DTP’S ROAD STRATEGY):

- Doesn’t allow for catastrophic increase in traffic resulting from spreading new housing estates across the borough.
- Out of sync with DTP’s strategy: houses to be built and Green Belt destroyed before plans for A3 etc implemented.
- Road plans too optimistic anyway, especially post-Brexit. Probably won’t happen.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8952  Respondent: 15107297 / Ian McQuattie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY I3 (SUSTAINABLE TRANSPORT):

- Just a list of generic measures, not related to real life or the particularities of Guildford.
- Fails to treat sustainability as a constraint. Assumes excessive levels of development proposed in the plan can be supported by sustainable development.
- Unrealistic. Most people can’t or won’t walk or cycle – commuters in a hurry, the elderly, children, people who are unwell or unfit, people carrying heavy shopping or other goods. I.e. most residents!
- Town’s eye view of transport. Ignores scarcity of existing rural public transport and commercial unviability of increasing it. Ignores terrible state of Surrey’s roads, potholes, flooding etc. Ignores extra stress to be created by huge new housing estates in countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8954   Respondent: 15107297 / Ian McQuattie   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY I4 (GREEN & BLUE INFRASTRUCTURE):

- No teeth. Policy cancelled out by huge developments across the countryside. No mention of opportunity costs of loss of Green Belt services and amenities (e.g. farming).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8915   Respondent: 15107297 / Ian McQuattie   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO POLICY P2 (GREEN BELT):

- No declaration of support for protecting the Guildford Green Belt, contrary to NPPF and government statements.
- No evaluation of value of local Green Belt as a public and private asset: it’s just treated as potential building land with a few inconvenient restrictions.
- Impact of Green Belt development on local agriculture ignored.
- Impact on rural leisure and tourism ignored.
- Impact on flood control ignored.
- Impact on carbon sink and knock-on effects for air pollution and climate change ignored.
- Impact on biodiversity ignored.
- Impact on natural heritage ignored.
- Impact on water catchment ignored.
- Impact on room for public space amenities (parks, cemeteries, waste facilities etc) ignored.
- Impact on rural business (e.g. mineral mining, film making) ignored.
- Impact on natural landmarks and views ignored.
- Harm to public health and wellbeing (physical, psychological) ignored.
- Allows excessive levels of development in breach of views expressed in last consultation and Conservative Party manifesto commitments at the last local elections.
- Has allowed ruling Councillors to argue that there is an acceptable percentage of Green Belt that should be sacrificed to development, when no such rule exists in the NPPF.
- Ignores alternative approaches, such as fair burden-sharing under which settlements would undertake to accommodate new development in proportion to their size.
- Disproportionate amount of development (most of it, in fact) to be in Green Belt. Too few new homes in urban areas where most people (especially the young and less privileged) want to live. This will act against much needed urban regeneration.
- “Insetting” of most villages disproportionate and unjustified in terms of their contribution under the NPPF to the purposes of the Green Belt. Based on flawed Green Belt and Countryside Study. Idea that most Guildford villages do not contribute to “openness” is subjective.
- Major settlement extensions allow indiscriminate housebuilding, as irregularly shaped villages are squared off to enclose green fields.
- Overall harm to Guildford Green Belt unjustified by any objective development need post-Brexit.
- Ignores most of NPPF 17 stipulations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8917  Respondent: 15107297 / Ian McQuattie  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
### I OBJECT TO POLICY P3 (COUNTRYSIDE BEYOND THE GREEN BELT):

- Gives Ash and Tongham more protection than rest of borough, including existing Green Belt. But they don’t contribute to preventing London sprawl.
- Special treatment of ward represented by current Council Leader and his predecessor. Politically biased.
- A minor extension of Green Belt in one place does not justify its major destruction elsewhere (the inset villages).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### I OBJECT TO POLICY P4 (FLOOD RISK AND WATER PROTECTION):

- Limits development of urban, brownfield, hardstanding sites, pushing development unnecessarily into the countryside.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### I OBJECT TO POLICY P5 (THAMES BASIN HEATH S.P.A.):

- Compensation mechanism too feeble to provide protection.
- Cynical encouragement of SANG to justify nearby development in protected areas. Does not extend protection or amount of green space, and can damage them (e.g. dog and cat attacks on wildlife).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I OBJECT TO POLICY S1 (SUSTAINABLE DEVELOPMENT):

- No definition given, no reference to its importance in the NPPF, no guidelines for applying it to planning.
- No statement of how economic, social and environmental impacts should be balanced.
- No mention of Green Belt, Guildford’s greatest legacy by far to Sustainable Development. No commitment to protecting it.
- No reference to most of the NPPF Core Planning Principles.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT TO POLICY S2 (BOROUGH-WIDE STRATEGY):

- Numbers based on growth and demographic data now invalidated by Brexit.
- No justification given for 13,860 housing figure. Figure based on a secret formula used by consultants and never seen by anyone on the Council or by the public. Council has failed to seek its disclosure.
- 13,860 figure confuses the OAN with a housing target. No definite housing target given, leaving too much scope for the Council to make one up. I can’t understand how we’re being consulted when we don’t know how many houses the Council want to build, taking all the contraints into account.
- Figures based on a Housing Market Area that ignores 2 neighbouring districts (Rushmoor and Mole Valley) and is much too small, since most people commute or travel far outside the Area to shop or study. This distorts the figures: no reason why Guildford needs to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 units.
- High numbers involved would transform character of the borough from mainly rural/Green Belt to urban.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am a Send resident and have just returned from holiday and hope I am not too late to object to some of the Local plan on the following grounds:

- I object to the removal of Send from the Green Belt because the village and its countryside provides an essential buffer between Woking and Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the building on the Green Belt at Send at Garlick’s Arch, because it is not justified by special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded.

I object to the development at Garlick’s Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks’ notice and without any prior consultation and is not required in terms of housing need either for the village or the borough.

I object to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available.

I object to the development at Garlick’s Arch because the site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The site is also subject to flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have lived in this village for over 40 years, understand the limitations of the infrastructure and the high cost of putting them right, and strongly object to any further housing development and urbanisation which have no evidence to back up their necessity.

The programme is being driven by remote central interests and ambitions and take no account of any objective approach to planning which should rightfully include consideration of and concentration on existing urban areas and brownfield sites, not open countryside and villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/137  Respondent: 15107777 / Paul Ayers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I should also like to object about the disproportionate concentration of proposed new development areas in this part of the Borough ie Ripley/Send/Wisley. The infrastructure is clearly not able to support more population and the improvement of the A3 junction at Burnt Common would be grossly insufficient to improve even the current situation let alone an increased level of population and traffic movement.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/136  Respondent: 15107777 / Paul Ayers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I also object to any reduction of land or village areas which are designated Green Belt. All the proposed areas and particularly Garlick’s Arch are in open countryside and this should never be considered for change of status in peacetime.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12128  Respondent: 15107777 / Paul Ayers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/116  Respondent: 15107777 / Paul Ayers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am a resident of Send and am writing to object to various aspects of the recently published Plan – above.

Firstly I object to the extremely limited consultation period and the last minute inclusion of new sites such as Garlick’s Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/513  Respondent: 15107777 / Paul Ayers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A43 (Garlick’s arch, now 400 homes and 6 traveller plots) changes because:

The land is beautiful, ancient woodland and in a permanent Green Belt area.

There is not a demand for 400 houses in Send, the demand is nearer to Guildford.

This plan over allocates housing in Send as opposed to other villages.

I object to taking land out of the Green Belt, whose purpose is to protect villages, and prevent urban sprawl.

Our village of Send is a small rural village which cannot support 400 extra homes: the infrastructure is inadequate, especially roads which are frequently jammed with traffic.

It is often flooded and is currently flood zone 2.

There is no demand for Travelling Show people plots here.

You have ignored all our previous objections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/514  Respondent: 15107777 / Paul Ayers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 (Burnt Common, change to a minimum of 7000 sq m industrial land) changes because:

It was deleted from the 2014 draft because of valid objections.

The word maximum in the 2016 plan has been changed to minimum.

Since 2016 there has been a decline in demand for industrial land, not an increase.

There is suitable vacant land for industry in Slyfield.

The impact on local roads will cause traffic gridlock.

It defeats the purpose of the Green Belt.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/111  Respondent: 15107841 / Alex Batlin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to register my objection i.e. I object - to the Guildford local plan 2016 involving Garlicks Arch. Thanks

Here are my reasons

1. Not protecting the Green Belt
   I object to the proposals to remove Ripley, Send and Clandon from the Greenbelt. There are no special circumstances to do this. Once taken the green belt is lost forever.

2. Disproportionate size of sites in relation to rural locations
   I object to the allocation of land to the strategic sites of Wisley Airfield, Garlicks Arch (Ripley/Send border) and Gosden Hill (Clandon). The proposed development of these sites will have a disproportionate impact on the surrounding local villages. They will have a permanent impact on each of these communities.

3. Unbalanced allocation of development in one area of the Borough
   Between the M25 and Burpham, a distance of only about 5 miles it is proposed that over 6,500 houses are built. This represents over 40% of the housing proposed in the Local Plan. I object to this area being hit so hard by the allocation of development, which is disproportionate to the rest of the Borough.

   I object to the development of the strategic sites due to A3 and M25 already being at capacity during peak hours. Highways England has no plans to look at improving the A3 before 2020. It is therefore not sustainable to identify sites for further development which will worsen the congestion on these motorways and trunk roads.

5. Congestion on the local village roads and lanes
   Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. I object to further development which will cause greater congestion in and around our villages.

6. Unsuitability of our local roads for heavy vehicles and more traffic
   Many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

7. Poor air quality concerns
   Further congestion, particularly in built up residential areas will only lead to greater levels of air pollution. I object to further development, which will result a fall in the air quality.

8. Lack of proper infrastructure planning for sites
   I object to the lack of planning and implementation of infrastructure. For example at Garlick’s Arch. Without improvements to the infrastructure prior to development, the existing residents’ quality of life will significantly deteriorate in many ways. How will the local services such as doctors and schools cope?
9. **Lack of Utilities Capacity**
   Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. I object to the development of Garlick’s Arch on the ground that there is little capacity in these networks.

10. **Sites being planned in unsustainable locations**
    Many of the strategic sites e.g. Wisley Airfield and Garlick’s Arch, are in unsustainable locations. They do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. I object on the grounds that these sites are not sustainable.

11. **Parking issues in local villages caused by larger population**
    Many of the affected villages, such as Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems. To which I object.

12. **Local healthcare facilities will be overwhelmed**
    Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. I object due to the further stress it will put upon existing health services.

13. **Local policing facilities will be overwhelmed**
    Police services are seeing funding reduced. The development of the likes of Garlick’s Arch and Wisley Airfield will stretch the police services further and I object.

14. **Local social welfare facilities will be overwhelmed**
15. **Local shops/restaurant facilities will be overwhelmed**
16. **No protection of heritage assets**
17. **No protection of the environment**
18. **Overdevelopment of sites**
19. **Not meeting the needs of local communities**
20. **Insufficient affordable housing**
21. **Poor quality of layout and housing design**
22. **Insufficient consideration of SPA, SSI and Conservation Area issues**
23. **Lack of proper cycle lanes on local roads**
24. **Lack of proper pedestrian footpaths on local roads**
25. **Current SHMA figure of 693 p.a. too high**

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Also in the Plan there appears to be a total lack of any sensible evidence for the requirement for the overall housing numbers. Yet another reason to object to the Plan.

If this seemingly ill thought through Local Plan goes ahead there appears to be no provision for new or additional schools places, or provision for Doctors Surgeries, considering the existing ones are already under immense pressure. Another reason to object.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/112  Respondent: 15107937 / Ken Harding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Also I object to the inclusion in the Local Plan of 2000 homes on the Wisley site despite earlier rejection by GBC as unsuitable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/141  Respondent: 15107937 / Ken Harding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object to the disproportionate amount of development in several areas of the Borough, including the Garlick's Arch site at Burnt Common which will add to the already heavy traffic using the local roads and local services.

Finally may I point out that Ripley already has a look of a giant car park during the day, with the High Street looking like a "drive through zone" due to the already huge amount
of traffic using the village to get to the A3/M25, and back.
To build the amount of housing included in the Local Plan will be a complete step in the
wrong direction for the local community and environmentally a disaster.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/140  Respondent: 15107937 / Ken Harding  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to strongly object to many issues contained in the unbelievably long
document of about 1800 pages covering the Draft Local Plan.
Firstly I object to the any erosion of the Green Belt and strongly object to any removal
of villages from the Green Belt, including Ripley where I have lived for the last forty years.
There appears to be no sensible reason or logic in this "in-setting" which will just help to
hasten the destruction of our rural environment and village life, and open the flood gates
for more and more building in previously rural areas to further destroy the natural surroundings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: SQLP16/124  Respondent: 15107937 / Ken Harding  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I must also object to the limited consultation period as it leads me to believe this was
to minimise the involvement of local interested parties and objections to the plan.
The last minute inclusion of new sites with less than 2 weeks notice begs the question
as to what is really going on? I must therefore register my objection to this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: SQLP16/117</th>
<th>Respondent: 15108065 / Claire Cable</th>
<th>Agent:</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I object

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I object

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I object

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I object

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID: SQLP16/120  Respondent: 15108065 / Claire Cable  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I object

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID: SQLP16/121  Respondent: 15108065 / Claire Cable  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID: SQLP16/122  Respondent: 15108065 / Claire Cable  Agent:**
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp173/38  Respondent: 15108065 / Claire Cable  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send Marsh/ Burnt Common

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A42/A43/A58

I object to all of the above policies mainly because it is building on Green Belt land - isn't there Green Belt for a reason??

The increase in traffic is already evident through send marsh and ripley on the lead up to the M25 this will only increase. This is a main school route so there will be an increase in accidents within the area.

Pollution will increase. And unnecessarily increase over development. One of the reasons we moved to send marsh from Guildford was because we wanted a quieter less traffic polluted area.

Where is the demand for Travelling Showpeople.

From what I understand from previous objection meetings I have attended this is down to land being "gifted" from a farmer and is clearly being offered a huge sum of money from the council to develop this land - that comes down to greed and nothing more. These developments are not required and as a local resident makes me angry that GBC would even consider some of these plans. Perhaps look at some of the other issues which require more attention and not just developing for the sake of developing!!!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/687  Respondent: 15108161 / Garry Lochhead  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object strongly to the planned additions of north and south-facing slip roads to the A3 in the vicinity of Garlick's Arch and Burntcommon on the basis that it will throw unmanageable levels of extra traffic onto the already busy A247 through Send Village.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<th>Respondent: 15108225 / Moira Noble</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): (Yes)</td>
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<td>I object on the basis that the evidence for the number of new homes required to satisfy the plan is excessive to support the estimated population growth of 20,000.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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I consider that this plan and consultation process is flawed. The transport infrastructure of Guildford cannot support the number of new homes proposed, and the provision of health services and education facilities are inadequate. Furthermore, the proposed expansion will change the town of Guildford and its outlying regions in such a way that the plan will have a disproportionate impact than if imposed on a larger established urban environment. I consider insufficient attention has been paid to the impact of this plan on the environment, to the well being and views of the residents in the various sites under consideration and the historical organic growth of the region.
I live in Merrow and am particularly concerned about the proposed development on the Gosden Farm site. The Aldi supermarket and recent Burpham housing developments have caused considerable traffic problems already in this area. A large number of houses on the farm will change the nature of the area completely, have a devastating impact on this community and bring with it unresolvable traffic problems.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/151  Respondent: 15108801 / David Allison  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The other serious issue is the infrastructure associated with the above proposals.

I have lived in Ripley/Send for 14 years and have been affected by the enormous increase in traffic flow on the A3 and the increase in traffic flow through Ripley Village.

Vehicle divert to try and avoid the traffic build up going from Guildford to the M25 junction 10.

With the above proposals there will be many more occasions of "Log Jams".

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/152  Respondent: 15108801 / David Allison  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Knowing there is a population explosion in the South East why do not local authorities encourage more housing developments to areas more suitable.

Clearly with very considerable increase in "Concrete" developments there are very real environmental concerns and diminishing quality of life resulting.
With the increase in aging population in the South East there will be a lack of doctors surgeries/hospital places and for the very young school places.

Surely you cannot build housing developments without ensuring first the provisions adequate roads, doctors surgeries, hospitals and schools are in place.

It would also seem that the sudden announcement of these developments gives very short notice to local population. Why??

It would be a tragedy if these proposals destroy our villages in this way.

PLEASE DON'T.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/150  Respondent: 15108801 / David Allison  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

"I OBJECT TO THE 2016 DRAFT LOCAL PLAN"

I have been made aware of the above development proposals affecting our villages.

Whilst I recognise the need for housing developments my main objection is the use of "Green Belt" land.

I have read numerous development proposals which could be located on "Brown Field" sites which I have no objection to.

The other serious issue is the infrastructure associated with the above proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/155  Respondent: 15108833 / Barry Armstrong  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
None of these villages has the roads to sustain the construction traffic during the building of these small towns, let alone the increase in traffic once complete. There is also a distinct lack of detail surrounding the provision of schools, doctors and other services required to support the increase in population to these areas.

Please do not pass this Local Plan as it put an even bigger burden on the already overstretched local services in these villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/153  Respondent: 15108833 / Barry Armstrong  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Green belt seems to be coming under increasing pressure without the slightest regard for the increased capacity on the infrastructure needed to sustain the constant bombardment of outrageous developments in the villages of Ripley, Send, Oakham and Wisley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/56  Respondent: 15109121 / Larry Bottomley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Subject: New local development plan comments

Having participated in the consultation of the “Draft Local Plan Strategy and Sites Document” during both 2013 and 2014, I object that the 2016 Proposed Submission Local Plan envisages now envisages previously unconsidered sites whilst dropping others that had some merit.

Notably the “74. Land around Burnt Common warehouse, London Road” with some A3 access is now no longer part of the Local plan, seemingly replaced with the significantly more extensive, new and previously unheralded proposals of “A43 Land at Garlick’s Arch Burnt Common” and “A44 Land West Ridge and Send Hill”. What had previously been envisaged as 315 homes has increased to 485 homes without reference to impact on infrastructure and local resources, and the new proposed A3 junction at Burnt Common likely to exacerbate the traffic problems within Clandon and Send.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3719  Respondent: 15109121 / Larry Bottomley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a resident in Send for over 20 years I have seen it grow.

However this last minute planning really worries me.

Many of the roads in Send are very narrow, especially the one up to Send Hill where many houses and a travellers's site are planned.

I wonder how all the increase in traffic will function.

The school coach and the refuse trucks have difficulty when passing cars any increase i numbers would make things worse.

Also when there is an accident on the A3 all too often now, the traffic is diverted onto Potters Lane then Send Hill or Vicarage Lane. It creates pandemonium.

The rush hour extends for most of the day. The new proposal for the A3 on and off junction at the Burnt Common roundabout would increase the huge lorries coming through Clandon, where they often have to climb the curb to get past cars and also those roads going through Send itself.

Garlic’s arch development would put pressure on the local schools and surgery where even at present it is difficult to be seen.

How is the infrastructure going to be developed to cope?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/114  Respondent: 15109121 / Larry Bottomley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

So specifically:

**Policy A43 30 ha land at Garlick’s Arch Burnt Common.**

Building at Garlick’s Arch means that on and off access to the A3 at the Burnt Common roundabout will be required but will also have a significant impact on the already congested local roads. We have massive lorries coming through Clandon, Send has a significant congestion problem at rush hour through to Old Woking and better access at Burnt Common to the A3/M25 will have a very damaging impact on both villages.

The road passing through Send is very congested for long periods during the day and this would only exacerbate the problem. The addition of 400 houses at Garlick’s Arch with no local offices or other places of work, increases those that need to drive to work. The addition of Industrial units will likely mean more large lorries on the narrow and already congested roads.

400 houses will increase pressure on Send First and St Bede’s (already full) and the Villages Medical Centre (where currently getting a timely appointment is challenging).

Without consideration of these resources or an integrated transport plan, I object to Policy A43.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPS16/115  Respondent: 15109121 / Larry Bottomley  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Policy A44. 1.9 ha Land West Ridge and Send Hill.**

This is a new proposal and certainly if it had been proposed earlier then concerns on building on a previous land fill waste site could have been investigated. There are currently vents in place on this site which may be a health and insurance concern for those that live in houses built on this site.

Do note that Send Hill is a very narrow road especially where it meets Potters Lane, where it is single width and very steep lane leading on to a blind corner. The increase in traffic from an additional 40 houses and 2 travellers’ sites would make this junction busier and therefore more dangerous.

Without consideration of the safety of building on the land fill or the traffic safety on Send Hill, I object to policy A44.

Please feel free to contact me at the e-mail address above if any of this reasoning requires further clarification.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
My continuing over-arching concern is the lack thought on the infrastructure development that will be required to support the implementation of the Local Plan. Increase in provision in Schools, hospitals, medical surgeries, local roads and public transport will all be required and the wholly inadequate provisions throughout the Local Plan will not be sufficient to make these developments sustainable. Individual developments will have an impact on physical and social infrastructure, whilst multiple developments will have an exponentially larger impact.

I have continuously responded to each iteration of the Local Plan with no discernible result other than what appear to be tangential changes. Requiring comments on only the changes in the Local Plan show that all previous comments, concerns and suggestions were futile and makes a mockery of local input in to the development of our environment.

I object to the proposal to *inset Send Business Park from the Green Belt* because it is in an area of outstanding countryside adjacent to the beautiful Wey Navigation and is an inappropriate development in the Green Belt. The site is on narrow country road leading in to Send, a town current gridlocked at rush-hour.

*What changes (2016)/further amendments (2017) do you suggest should be made to the document?*

Attached documents:

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I object to the *Policy A42 change* at Clockbarn in Tannery Lane because the increase in homes ignores all previous comments, will worsen the chronic traffic problems through Send and associated roads, and makes no provision for increase in supporting social infrastructure in local schools, surgeries, roads or public transport. This development requires an expansion of existing local GPs Practices (none referenced in Section 6, Health and Social Care), an increase in Early, Primary and Secondary Education provision (none referenced in Section 4 Education), and material traffic management measures throughout Ripley, Send and Clandon (other than LRN7 and LRN20 none referenced in Section 1, Transport).
I object to **Policy A 58** at Burnt Common because it ignores all previous comments that caused its withdrawal from the 2014 draft, there is no demonstrable case for the requirement for such a development while sites remain empty at Slyfield, and the change of “maximum” to “minimum” in has no commercial basis. This development will only contribute to the chronic traffic problems in the area. This development requires material traffic management measures through Send and Clandon.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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I object to **Policy A 58** at Burnt Common because it ignores all previous comments that caused its withdrawal from the 2014 draft, there is no demonstrable case for the requirement for such a development while sites remain empty at Slyfield, and the change of “maximum” to “minimum” in has no commercial basis. This development will only contribute to the chronic traffic problems in the area. This development requires material traffic management measures through Send and Clandon.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **Congestion on the trunk roads, A3/M25**
   I object to the development of the strategic sites due to A3 and M25 already being at capacity during peak hours. In the morning it regularly already takes 40 minutes or more to travel the three miles from my home to join the M25. Highways England has no plans to look at improving the A3 before 2020 and even then it is doubtful if those plans will be sufficient. It is therefore not sustainable to identify sites for further development which will worsen the congestion on these motorways and trunk roads.

2. **Congestion on the local village roads and lanes**
   Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. Send Marsh Road is already a rat run with constant traffic using it as a cut through. I object to further development which will cause greater congestion in and around our villages.

3. **Unsuitability of our local roads for heavy vehicles and more traffic**
   Many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

4. **Lack of proper infrastructure planning for sites**
   I object to the lack of planning and implementation of infrastructure. For example at Garlick’s Arch. Without improvements to the infrastructure prior to development, the existing residents’ quality of life will significantly deteriorate in many ways. We already struggle to get doctors appointments and the local schools are already struggling.

5. **Lack of Utilities Capacity**
   Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. I object to the development of Garlick’s Arch on the ground that there is little capacity in these networks.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/169  Respondent: 15109377 / Cara Crawford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **Sites being planned in unsustainable locations**
   Many of the strategic sites e.g. Wisley Airfield and Garlick’s Arch, are in unsustainable locations. They do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. I object on the grounds that these sites are not sustainable.
2. **Parking issues in local villages caused by larger population**
   Many of the affected villages, such as Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems. To which I object.

3. **Local healthcare facilities will be overwhelmed**
   Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. I object due to the further stress it will put upon existing health services.

4. **Local policing facilities will be overwhelmed**
   Police services are seeing funding reduced. The development of the likes of Garlick’s Arch and Wisley Airfield will stretch the police services further and I object.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/165  **Respondent:** 15109377 / Cara Crawford  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to lodge my strong objection to the Guildford Local Plan 2016.

1. **Failure to protect the Green Belt**
   I object to the proposals to remove Ripley, Send and Clandon from the Greenbelt. There are no special circumstances to do this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/167  **Respondent:** 15109377 / Cara Crawford  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **Unbalanced allocation of development in one area of the Borough**
   Between the M25 and Burpham, a distance of only about 5 miles it is proposed that over 6,500 houses are built. This represents over 40% of the housing proposed in the Local Plan. I object to this area being hit so hard by the allocation of development, which is disproportionate to the rest of the Borough.

   **What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

   **Attached documents:**

<table>
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<th>Respondent: 15109537 / Elizabeth Alexander</th>
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   Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

   **Answer (if comment is on questions 1-7 of the questionnaire): ()**

   I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

   **What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

   **Attached documents:**

<table>
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<th>Respondent: 15109537 / Elizabeth Alexander</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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   Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

   **Answer (if comment is on questions 1-7 of the questionnaire): ()**

   2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

   10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

   After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.
Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/171  **Respondent:** 15109537 / Elizabeth Alexander  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I am against the Local Plan. I feel that in the Historic Environment section especially, the local plans ride roughshod over the hopes, feelings and consideration of all people living in those areas. This could be the ruination of Surrey as we know it.

I refer in particular to 11.31 and 11.32 which deal with development adjacent to and within the conservation areas. The possible development of these areas do not take into account the height of new buildings on the skyline - and the Wisley development in particular where blocks of flats will dominate views as far as the Surrey Hills.

As Junction 10 on the M25 will have to be completely rebuilt, this whole area including RHS Wisley Gardens will be ruined for ever.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/2814  **Respondent:** 15109537 / Elizabeth Alexander  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Answer (if comment is on questions 1-7 of the questionnaire): ()

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5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/2817</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2813   Respondent: 15109537 / Elizabeth Alexander   Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/59   Respondent: 15109601 / Louise Majithia   Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the new local plan as Send should not be removed from the green belt. Planning on any of the suggested sites will have a major impact on Send and its natural beauty green belt land.

I object to destroying beautiful GREEN BELT countryside with these proposed developments. The proposals of the travellers pitches is inappropriate due to insufficient access to the site along a single track road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/117   Respondent: 15109601 / Louise Majithia   Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the suggestion of new houses at Garlick’s Arch, Burnt common does not need new houses. The site has not been consulted on properly and is a conservation area. The implications of the extra traffic will gridlock send. The infrastructure cannot cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford borough Council have not followed the correct process when proposing these new developments. They are trying to take the short cut of using regulation 19, instead of following regulation 18 as they should.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

What on earth do you lunatics think you are trying to do through forcibly granting building restrictions on land that has to be protected by people such as yourselves.

Stop this immediately

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
### Comment ID: PSLPS16/121  **Respondent:** 15109857 / Simon Creed  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Please can we crack on with the plans to add 2000 houses at Wisley and the 500 houses in Horsley? Accommodation is desperately needed and you must ignore all these bleats about greenbelt (Horsley is built in the greenbelt thanks to some far sighted people in the 40's and 50's).

It is time for someone to make a decision to get the houses built. The proposed plan is a start but only building 30 new houses per year is simply insufficient.

All the Neighbourhood Plan people in this village seem to be involved only to try and stop any development.

Please approve and get started

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: pslp172/1110  **Respondent:** 15109857 / Simon Creed  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

My view is that the plan is too conservative. There is ample room in the Horsley's - where I live - and the surrounding villages for many more houses. GBC must not allow itself to be intimidated by well connected and well funded NIMBIIES.

the fact is that all of the villages have been developed within the green belt - whatever that is - and can be significantly enlarged without any impact on the nature of the area.

Wisley development is desperately needed.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/6158</th>
<th>Respondent: 15109985 / Shane Sayed</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

(2) I object to the Wisley Airfield, Garlicks Arch (Ripley/Send border) and Gosden Hill (Clandon) sites being used for housing development as the nearby villages simply cannot support the increase in traffic.

(3) There is already a very high level of traffic congestion in Ripley high St, sometimes gridlocked at rush hour already making access to services and residences in ripley very difficult and stressful. I also object to the vast increase in traffic that would arise on the junction between the M25 and A3.

(4) I object to the additional strain that the Villages Medical Centre, Send will have as a result of the large increase in population in the area. This service is already overstretched and the development will exacerbate the problem.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

With regard to the proposal for 400 homes on green belt land at Garlick's Arch near Burnt Common I have the following objections:

(1) The area proposed for housing development is Green Belt land and I strongly object to this area of woodland being lost forever and turned into a housing estate. My family regularly use this area for recreation purposes and do not want to lose this area of natural beauty.
(2) I object to the Wisley Airfield, Garlicks Arch (Ripley/Send border) and Gosden Hill (Clandon) sites being used for housing development as the nearby villages do not have the infrastructure to support the increase in traffic, population. I also object to the disproportionate amount of housing being proposed for these areas as the level of congestion will rise to an unacceptable level in the surrounding roads, lanes and major thoroughfares.

(3) There is already a very high level of traffic congestion in Ripley high St as well as the junction off the A3 into Send village and I object to the increase in traffic that would materialise as a result of the proposed development. I also object to the vast increase in traffic that would arise on the junction between the M25 and A3.

(4) I object to the additional strain that the Villages Medical Centre, Send will have as a result of the large increase in population in the area. This service is already overstretched and the development will exacerbate the problem.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/6156  **Respondent:** 15109985 / Shane Sayed  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Regarding the proposal for 400 homes on green belt land at Garlick's Arch near Burnt Common I have the following objections:

(1) This area is Green Belt land and I strongly object to losing this area of woodland which my young family uses on a very regular basis.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/98  **Respondent:** 15110177 / GORDON TURNER  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to proposals slipped into the council meeting in a very underhand way!

1. GBC have not followed any sort of correct process in the way they have dealt with local planning in my area. Evidence shows in 2014 a proposal for 430 houses went down after objection to 185 (Although a large number it could have been liveable) but some how has sneaked up to 485. These significant changes require a full consultation under Regulation 18 not the short cut which GBC are trying to sneak in through the back door.

1. The Strategic Housing Market Assessment 2015 results are ‘Elastic’ in there very nature. By using such data as Foreign students to inflate the need for GBC purposes. Remember there are Lies Damm lies and Statistics. The required 13,860 homes in the local plan, in this affluent area would probably house somewhere in the region of 41,580 if they each had 3 people living there. To that end half this number would suffice to deal with the increase in population growth Our area could not deal with that population increase unless there is some major investment we are missing like another school health centre etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/146  Respondent: 15110177 / GORDON TURNER  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43. 30 ha Land at Garlicks Arch. There is no need for anymore houses ontop of the already proposed 13860 houses in the plan. An industrial centre there is a complete joke how will Send A247 deal with the increased HGV traffic? I do await you thoughts on this as I live on Send Barns Lane and are probable in a better place to judge the impact it would have than people at GBC unless you wish to come and stay at my address for some days to get first hand experience.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/131  Respondent: 15110177 / GORDON TURNER  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)
No I object to the Up to date part as there has been no real consultation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/132  Respondent: 15110177 / GORDON TURNER  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

No I object as GBC have failed to provide sound evidence in terms of the employment land needs Assessment 2015

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/133  Respondent: 15110177 / GORDON TURNER  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I Object as No real consultation has taken place

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/176  Respondent: 15110721 / Stuart Reeves  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )
I object to the plan. Send provides a buffer between Woking and Guildford and should not be removed from the green belt. The land west of winds ridge and send hill is a new site and was not included in the regulation 18 and has not been consulted upon previously. Development for housing is inappropriate due to its perminant green belt status and high quality green belt amenity within an area of beautiful countryside which would be spoilt by development. The subsoil of the existing site is also inappropriate for housing and the access road on Send hill is a narrow single width track unsuitable for access and additional volumes of traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/134  **Respondent:** 15110721 / Stuart Reeves  **Agent:**
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

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I object because the number of required houses has been exaggerated. 50% of the new homes could be built on brown field sites and the infrastructure overload has received very little analysis.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/135  **Respondent:** 15110721 / Stuart Reeves  **Agent:**
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)
I object because GBC have not followed correct process the 2014 proposal for 430 houses went down in 2016 to 185 and has now gone up to 485. These significant changes require another full consultation under regulation 18.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/136  Respondent: 15110721 / Stuart Reeves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I do not consider the strategy as a whole to be sound.. GBC have failed to provide sound evidence of the employment land needs assessment 2015 which showed a reduction in employment space. This means that the number of houses required has been exaggerated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/137  Respondent: 15110721 / Stuart Reeves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I object to the plan because BGC has not fully met it's requirement for full consultation under regulation 18.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/138  Respondent: 15110721 / Stuart Reeves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

The inclusion of 400 homes and industrial warehousing at Burnt Common in the plan is new and not included in the regulation 18 draft.

I therefore object that a full impact assessment has not taken place.

A new four way interchange onto the A3 would be disastrous for Send. Send would be grid locked all day and the enlarged Send first school would become inaccessible as a local school and dangerous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/65  Respondent: 15111713 / Niall Malak  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley South

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My concerns as a resident of West Horsley is the lack of infrastructure and removal from the Green Belt.

We have a shortage of school places, you can't see your GP due to so many people.

I feel this removal from the Green Belt will be a trigger for all the developers to think of the Horsleys as fair game and Change the fabric and feel of the village forever.

Where is the guarantee any of these houses will be for 1st time buyers or even affordable?

I estimate they will be more like millionaire pads with no real improvements for the local population.

Where is the protection for our green spaces and any guarantee the number quoted is fixed for 20 years or more?

I'm not against new homes, provided they are for the benefit of this who need them. I also can't see why the need to take the villages out of the green belt?

There seems to be no guarantees or protection for the villagers and certainly no thought through infrastructure plan.

Therefore, I object to the volume of the plan and the lack of accountability of the so called plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/125  Respondent: 15111745 / Aderyn Bird  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A21

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am e-mailing in relation to the allotment site concerned in Policy A21 and would like to express my utmost support for retaining the whole site as allotments.

From my experience, there has been a long waiting list and huge demand for plots on the site as a trend for home-grown food for healthier living increases in popularity. I firmly believe that the fresh air, exercise, and organic produce that comes from owning a plot is highly beneficial in facilitating and maintaining a healthy lifestyle.

I am immensely pleased the Council is in favour of retaining the allotment site as part of the Local Plan and wish to continue to support it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/69  Respondent: 15111873 / Cindy Knight  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3) I object to the fact that there is no thought to the infrastructure of the sites by way of doctor’s surgeries, schools etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/184  Respondent: 15111873 / Cindy Knight  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
4) I object to the fact that these sites will give more congestion to the M25 and A3. There is already traffic congestion most days of the week trying to get passed Guildford.

5) I object to the fact that these developments will cause more parking problems – it is virtually impossible to park in Ripley as it is.

6) I object to the fact that residents in the new developments would be reliant on motor cars etc. as there are no railway stations near and the bus service is being reduced all the time.

Please give the above your urgent consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/181  Respondent: 15111873 / Cindy Knight  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the above Plan for the following reasons:

1) I object to the removal of our villages i.e. Ripley, Send, Clandon from the Greenbelt as I feel that once removed the Greenbelt will be lost forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/183  Respondent: 15111873 / Cindy Knight  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2) I object to the size of the proposed sites at Garlick’s Arch, Wisley Airfield and Gosden Hill – too many houses in a relatively small area of the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/70  Respondent: 15111905 / Wendy Reed  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the lack of provision for new schools and doctors which are already under strain with the population increase.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPA16/71  Respondent: 15111905 / Wendy Reed  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT to the lack of any evidence fort the alleged housing numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPA16/72  Respondent: 15111905 / Wendy Reed  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We do not wish to live in a large town hence we moved to a village in the green belt.

There are sufficient brown sites available and Woking and Guildford are already inundated with tower blocks of new flats.

We strongly object to the way Guildford B.Council is attempting to reduce green belt and built houses and incur congestion where it is not appropriate.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/187  **Respondent:** 15111905 / Wendy Reed  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We purchased Bramble way in Send Marsh specifically because it was in a green belt environment. We do not want this green belt taking away and becoming a suburb of Guildford/Woking which it will become with no green space in between and a mass of housing and traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/186  **Respondent:** 15111905 / Wendy Reed  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

re the GBC plan to build over 14,000 new homes under the revised draft local plan such as Garlicks' Arch, Wisley and Gosden Hill.

It is bad enough getting out of Send Marsh Road onto Portsmouth Road in rush hour times and this area CANNOT cope with additional housing and traffic. Soon there will be a fatal collision as the roads cannot cope with this extra traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/188  **Respondent:** 15111905 / Wendy Reed  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Therefore I want to formally confirm that:

I OBJECT TO any/all erosion of the green belt

I OBJECT to any ‘in-setting’ of any villages from the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/189  Respondent: 15111905 / Wendy Reed  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the planned development in one area of the borough which cannot sustain this

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/140  Respondent: 15111905 / Wendy Reed  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO the limited consultation period and last minute inclusion of new sits with less than 2 weeks notice - THIS IS UNACCEPTABLE

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/193  Respondent: 15112193 / Jennifer Reigate  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed development at Garlicks Arch on the Ripley and Send border and Gosden Hill Clandon. This will have an impact on the services to these areas such as Health and Education. The Villages Medical Centre is already stretched and there is a wait for appointments and the local schools will be oversubscribed resulting in local people not being offered a place for their children, this putting a strain on transport.

The added developments will mean an increase in traffic which is already severely contested in peak times. Rose Lane and Newark Lane being worst hit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/192  Respondent: 15112193 / Jennifer Reigate  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to remove Ripley,Send and Clandon from the Green belt. There are no clear reasons to do this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/73  Respondent: 15112257 / Richard Winzor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
3) Other local infrastructures such as Power, Water and Sewage and Healthcare will be severely strained. There appears to be no provision for improvements to the first two, which would in any case cause more disruption to the area, with local roads being excavated to accommodate larger sewers and more power cables. The local area seems to be continually dug up as it is! The local Healthcare, such as the Villages Health Centre in Send, is also currently strained and could not cope with an influx of the residents for the proposed 6500 homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/196  Respondent: 15112257 / Richard Winzor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2) I object to the plan to remove green belt status to this largely rural area of Surrey, which will create ribbon development along the A3, and set a precedent for further such developments in the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/195  Respondent: 15112257 / Richard Winzor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to register my objection to the above plans on the following grounds:

1) The communications in the local area are totally inadequate for such large-scale developments. As there is no rail link nearby, this will inevitably mean that local roads will bear the brunt of the large extra influx of residents/workers. The local roads cannot cope currently with the flow of vehicles at rush hours and school runs and the A3 is often near saturation point in the proximity of the M25 Interchange. The situation is bound to become considerably worse with the proposed plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/197  Respondent: 15112257 / Richard Winzor  Agent:
4) Other facilities such as local businesses, shops and restaurants could be strained or overwhelmed with many more vehicles chasing already non-existent parking places. Indeed the largest supermarket in the area, Budgen in Ripley village, is actually closing down this week!

In summary, the proposals will place an intolerable strain for existing residents, and those who need to use the local infrastructures, and should therefore not be permitted to go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The size of this development would particularly change the character of these villages to part of an urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/215  Respondent: 15112769 / Gordon Laidlaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the draft plan for the building of the thousands of houses in my area of Send, Ripley and Clandon. These proposals would completely destroy the character of these villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/204  Respondent: 15112769 / Gordon Laidlaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the draft Local Plan with its proposed developments in Ripley, Send and Clandon.

As a resident living off the Portsmouth Road I am already blighted with traffic noise and pollution from this road. This proposed change would further exacerbate these problems. Traffic flows through these three villages are already reaching crisis point as the road systems were never planned for these volumes of traffic - especially regarding Ripley and Clandon.

To bring forward a proposal of this size without adequate discussion with local residents is extremely dictatorial and unacceptable. Local amenities such as doctors’ surgeries and schools are already stretched.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/216  Respondent: 15112769 / Gordon Laidlaw  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Apart from this, the flow of traffic through Ripley and Clandon are already causing extreme problems with large articulated lorries attempting to negotiate the narrow stretches of roads these villages offer.

I have seen many blockages there caused by these lorries unable to pass each other on the narrow bends and even causing accidents. The A3 into Guildford from Clandon already becomes severely blocked too at certain times of the day and one can imagine the extra vehicles from these houses would cause further and more frequent chaos for these poor travellers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/206  Respondent: 15112769 / Gordon Laidlaw  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object strongly to the dictatorial edict proposed to withdraw the Green Belt status of Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/217  Respondent: 15112769 / Gordon Laidlaw  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Without protection of the Green Belt all types of unacceptable developments such as these would appear in our villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Insufficient time has been given to allow locals to be involved in the discussion of these plans.

The way in which they have been launched is most unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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2) **Size and Location of the Proposed Development at Garlick’s Arch**

   We strongly object to the development, which is large for the area, with over 400 houses proposed, which would have a massive impact on the local villages infrastructure as follows:

   a) Traffic / Congestion – Send and Ripley are massively impacted by their location to the A3/M25. it is almost impossible some mornings to get out of the top of our road (we live in Chestnut Close) – trying to turn right onto Portsmouth Road is not only difficult it is also dangerous during rush hour. From 7.30 onwards during morning rush hour there is a queue of
traffic from the junction of Portsmouth Road and Send Marsh Road, going down past Linden Way and all the way back past the Saddlers Arms, often as far as the green. It also queues at Mays Corner / Send Crossroads, up past send First School to the roundabout, and going the other way towards Woking This is the situation on a normal day. If there is an accident on the A3 or the M25 or roadworks or any kind of adverse weather or other problem the situation is ten times worse! (we suggest a traffic survey team would be advised to monitor for themselves). If you build 400 houses and an industrial site, in this area, the congestion it would cause with at least 400 extra cars + on the road would be phenomenal. Further to this the detrimental impact of pollution in this area. And not to mention the impact of these extra cars speeding up and down Send Barns Lane past the school – which already is dangerous as there is no crossing. If you factor in a further 2000 homes still proposed in the local plan at Wisley (despite earlier rejection by Guildford Borough Council), along with proposals for 2200 homes at Clandon/Burpham – these proposals will create further traffic problems and congestion.

b) Infrastructure – There are not enough primary and secondary school places as it is for the residents of Send and Ripley. What proposals are in place for school places for an extra 400 + children at least, not just for the immediate future but the next 5/10 years.? If this proposal is pushed through then schools should be built concurrent to the housing, otherwise there will be serious issues for residents. It is also virtually impossible to get to see a doctor at The Villages Medical Centre – not only can you never get through on the phone, but when you can you not get an appointment. They cannot cope with the volume of residents – much of which is an ageing population – without several hundred extra residents – and their children etc. I agree that there is a chronic shortage of housing in the Borough – especially affordable housing – we appreciate that provision needs to be made for more housing (our children are 17 and 15 and they will never be able to afford a home in this area – that’s if there are even any available!) but you cannot just continue putting up massive housing developments without putting in the infrastructure alongside the housing, to support the residents.

We strongly object to these proposed developments and also to the lack of consideration given to the residents and their concerns, the limited consultation period and the lack of planning for the adverse effects on infrastructure these developments will have on the surrounding area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/211  **Respondent:** 15113281 / Mr and Mrs Richardson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

WeI write with reference to the proposed development on Green Belt Land of 400 houses and an industrial site at Garlicks Arch – Burnt Common Send Ripley Borders which has been drafted into the Guildford Local Plan 2016. We would like to register my objection to this proposed development for the following reasons:

1) **Erosion of the Green Belt –**

We strongly object to this development as it is proposed on a Green Belt site. Once this area is developed not only will this part of the Green Belt be eroded, but it will set a precedent for future development and erosion of the green belt – not only in Send/Ripley and Clandon villages but on other green belt sites within the Guildford area. The Green Belt should and must be protected, and whilst I appreciate the need for more housing in Guildford, there are plenty of brownfield sites which can be redeveloped. Also, it is alarming that not only is housing proposed on the greenbelt, but also an industrial site – which will have a negative impact on the surrounding environment e.g. pollution, long term damage
to the surrounding countryside and the animals within this area (for example the deer which often use this land for
grazing).

Furthermore, we also object to the proposed removal, through “in-setting”, of several villages from the Green Belt (e.g.
Send, Ripley, Send, Clandon and Wisley to name a few).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPS16/129  **Respondent:** 15113377 / Jemma Winterton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I live in Rose Lane in Ripley and I am very concerned to hear the proposal of building new homes on the site of Garlick
Arch. There are many reasons as to why I object to this, preserving the green belt is vital in the survival of woodland that
has existed for decades and the destruction of this will not only make the area an eye sore but the destruction of wildlife
habit I strongly object to.

Secondly the road leading to and from Ripley is already congested and any additional traffic will add to this congestion
which will make life unbearable for the local residents who like me have lived a village lifestyle for a number of years and I
object to the added noise pollution, general congestion, air pollution and parking issues, traffic jams this will create before,
during and after the homes are built.

The facilities in Ripley itself will not be able to cope with the parking situations that will increase to an already
overcrowded situation to which I also very strongly object too.

The only parking facilities in Ripley are the ones in White Hart Meadows and this is overcrowded each and everyday
posing major issues for the residents and this will only increase as there are very few local shops which won't cope with the
demand hence I object to the housing on Garlick Arch as the area will not cope with the demands.

I believe that Ripley is a village not a new mini town and well not be able to cope with the burden of extra traffic, people
and congestion and pollution. It is an area a beauty and this atmosphere will be destroyed if new homes are built in and
around the surrounding areas of Garlick Arch. I, strongly object to the proposal and the green belt must and should survive
for the reasons I have stated above and for a wide variety more and the proposal should be dismissed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/214  **Respondent:** 15113441 / Alex Richardson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

---
2) Size and Location of the Proposed Development at Garlick’s Arch -

We strongly object to the development, which is large for the area, with over 400 houses proposed, which would have a massive impact on the local villages infrastructure as follows:

a) Traffic / Congestion – Send and Ripley are massively impacted by their location to the A3/M25, it is almost impossible some mornings to get out of the top of our road (we live in Chestnut Close) – trying to turn right onto Portsmouth Road is not only difficult it is also dangerous during rush hour. From 7.30 onwards during morning rush hour there is a queue of traffic from the junction of Portsmouth Road and Send Marsh Road, going down past Linden Way and all the way back past the Saddlers Arms, often as far as the green. It also queues at Mays Corner / Send Crossroads, up past send First School to the roundabout, and going the other way towards Woking This is the situation on a normal day. If there is an accident on the A3 or the M25 or roadworks or any kind of adverse weather or other problem the situation is ten times worse! (we suggest a traffic survey team would be advised to monitor for themselves). If you build 400 houses and an industrial site, in this area, the congestion it would cause with at least 400 extra cars + on the road would be phenomenal. Further to this the detrimental impact of pollution in this area. And not to mention the impact of these extra cars speeding up and down Send Barns Lane past the school – which already is dangerous as there is no crossing. If you factor in a further 2000 homes still proposed in the local plan at Wisley (despite earlier rejection by Guildford Borough Council), along with proposals for 2200 homes at Clandon/Burpham – these proposals will create further traffic problems and congestion.

b) Infrastructure – There are not enough primary and secondary school places as it is for the residents of Send and Ripley. What proposals are in place for school paces for an extra 400 + children at least, not just for the immediate future but the next 5/10 years.? If this proposal is pushed through then schools should be built concurrent to the housing, otherwise there will be serious issues for residents. It is also virtually impossible to get to see a doctor at The Villages Medical Centre – not only can you never get through on the phone, but when you can you not get an appointment. They cannot cope with the volume of residents – much of which is an ageing population – without several hundred extra residents – and their children etc. I agree that there is a chronic shortage of housing in the Borough – especially affordable housing – we appreciate that provision needs to be made for more housing (our children are 17 and 15 and they will never be able to afford a home in this area – that’s if there are even any available!) but you cannot just continue putting up massive housing developments without putting in the infrastructure alongside the housing, to support the residents.

We strongly object to these proposed developments and also to the lack of consideration given to the residents and their concerns, the limited consultation period and the lack of planning for the adverse effects on infrastructure these developments will have on the surrounding area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We write with reference to the proposed development on Green Belt Land of 400 houses and an industrial site at Garlicks Arch – Burnt Common Send Ripley Borders which has been drafted into the Guildford Local Plan 2016. We would like to register my objection to this proposed development for the following reasons:

1) **Erosion of the Green Belt**

   We strongly object to this development as it is proposed on a Green Belt site. Once this area is developed not only will this part of the Green Belt be eroded, but it will set a precedent for future development and erosion of the green belt – not only in Send/Ripley and Clandon villages but on other green belt sites within the Guildford area. The Green Belt should and must be protected, and whilst I appreciate the need for more housing in Guildford, there are plenty of brownfield sites which can be redeveloped. Also, it is alarming that not only is housing proposed on the greenbelt, but also an industrial site – which will have a negative impact on the surrounding environment e.g. pollution, long term damage to the surrounding countryside and the animals within this area (for example the deer which often use this land for grazing).

   Furthermore, we also object to the proposed removal, through “in-setting”, of several villages from the Green Belt (eg Send, Ripley, Send, Clandon and Wisley to name a few).

   What changes (2016)/further amendments (2017) do you suggest should be made to the document?

   Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write in reference to the above to register my strongest possible objection to it, on two grounds.

In the first instance the plan is fundamentally undemocratic with respect to something as significant as changes to boundaries. The ability of the local area to influence its own affairs, particularly regards decisions that would affect residents, will be much reduced.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/80  Respondent: 15114017 / Jo Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object the lack of evidence that these high numbers of houses are actually needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/222  Respondent: 15114017 / Jo Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that we purchased a house on Burnt Common Lane with views over fields and now the local plan want to remove this view and replace with 400 houses, industrial units and slip roads.

I object to the planned A3 junction changes at Burnt Common due to the negative effect on the surrounding villages which will not be able to handle the additional traffic in an already busy area.
I object to all the additional houses when the local schools are already overwhelmed with new applicants. The school in Send where my children attend is currently being rebuilt, with no further capacity to take additional children and has no desire to do so.

I object to all the additional houses as the local doctors surgery is already at its full capacity and this will put additional pressure the services impacting local services.

I object to the additional amount of cars that will be on the road in the immediate and surrounding areas, causing further risk to our children as they travel to and from school.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/221  **Respondent:** 15114017 / Jo Wright  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I live on Burnt Common Lane and I **strongly object** to the amount of Green Belt being removed from Send/Ripley in the new local plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** SQLP16/144  **Respondent:** 15114017 / Jo Wright  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the way in which the Garlick’s Arch development was added to the local plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp172/1280  **Respondent:** 15114017 / Jo Wright  **Agent:**
I object to the change to Policy A42 at Clockbarn, Tannery Lane as:

1. There are an additional 15 houses, the local roads will not be able to cope with the additional traffic causing congestion and safety issues for local children walking to school and playing.
2. The land is Green Belt
3. It will increase the risk of surface water flooding in the local area, which is already an issue
4. The local infrastructure is not in place for the increase in housing e.g. the medical centre is already at capacity and Send Primary size cannot be increased to accommodate the additional intake.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1279  Respondent: 15114017 / Jo Wright  Agent:

I object to Policy A43 at Garlicks Arch as:

1. The addition of 6 Travelling Showpeople plots – is there really a requirement in the local area?
2. Thousands of objections to proposals and the volume of housing have been made and ignore with the same number of houses being included, of which the infrastructure is not in place and will cause huge safety issues in an area where there are already several near-misses with the junction of Burnt Common Close. It will cause over development of the area and the village.
3. There are no exceptional circumstances for building on this Green Belt land, more so on the ancient woodland
4. Increased risk of flood (currently a flood zone 2 allocation)
5. The land is contaminated by lead shot

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the change to Policy A58, Burnt Common, London Road

1. The area is close to Slyfield, therefore does not require an additional industrial estate.
2. There is a decline in demand for industrial land since the 2016 proposal
3. The impact on small surrounding roads will create traffic gridlock

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/306  Respondent: 15114017 / Jo Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy 2, para 4.3.15 to inset Send Business Park from the Green Belt because: -

1. There is very restricted vehicular access along Tannery Lane in both directions
2. Further development here detracts from the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/232  Respondent: 15114145 / Barry Roads  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the lack of provision to improve the current infrastructure which is currently inadequate.
2. I object to the lack of additional parking provisions in the villages – again which are currently inadequate.
3. I object to the 4 way junction to the A3 which will force more traffic through the already overloaded roads, which incidentally are in a very poor state of repair.

1. I object to the Garlick’s Arch development as it does not provide for sufficient Utilities capacity which is currently almost at capacity.
2. I object to the designated 400 houses at Garlick’s Arch as this is in addition to the 13,000 odd already proposed for the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. I object to local villages (Send, Ripley, Clandon, Wisley) being removed from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. I object to large developments in one area – ie at least 400 homes at Garlick’s Copse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to further large developments due to the greater levels of air pollution that will result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: SQLP16/146</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the Council bringing this proposal in without any Community consultation and the lack of time given to object.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43

I object to the above Policy change at Garlick’s Arch which is now 400 homes and 6 travelling show people plots.

Why do the previous thousands of objections appear to be ignored by the Council?.

This land is green belt – the Government itself states the following:-

Green Belt serves five purposes:
• to check the unrestricted sprawl of large built-up areas
• to prevent neighbouring towns merging into one another – Send and Ripley will become one if these homes are allowed to be built.
• to assist in safeguarding the countryside from encroachment
• to preserve the setting and special character of historic towns
• to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

So as there are no exceptional circumstances why are these being ignored in respect of Garlick’s Arch that has been around for hundreds of years.

I have lived in Send Marsh for 21 years and in all that time there has never been a proven demand for Travelling show people spaces.

Already at peak times it is very difficult to get out of Send Marsh Road onto the old A3 and these homes will only generate additional traffic – additionally if there is a problem on the main A3 all the traffic filters down through the old A3.

I do not believe that sufficient thought has been given to the infrastructure of the whole area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/82  Respondent: 15114529 / Phil Vowels  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Driving back into my beloved home village of Ripley from Guildford just now, I was again reminded of its beauty. Tranquil, green open spaces, the farm shop, the common. Immediately opposite the Garlick’s Arch copse of mature trees are a myriad of signs imploring residents to object to the proposal to remove our village from the Green Belt. I agree with the signs.

I OBJECT to any “in-setting” of Ripley.

I OBJECT to all erosion of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/236  Respondent: 15114529 / Phil Vowels  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The more I read of the plan, the more I see endless references to the “needs of travellers” or “students” or potential new residents – what about the needs of the existing communities?? What about the impact of more traffic and the destruction of priceless countryside? Why do you imagine people live here in the first place – precisely because these are villages and not towns.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/234  Respondent: 15114529 / Phil Vowels  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I live in this part of Surrey precisely because it’s not a London over-spill (like grubby Croydon or Sutton). Reading your Local Plan, 5.3 in the Policy Approach will ensure the permanent destruction of the beauty of this area by building all over not only Ripley, but nearby West Horsley, Send and Effingham. How on earth do you imagine the infrastructure of this area will cope with thousands of new homes?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/235  Respondent: 15114529 / Phil Vowels  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Why is it proposed to build so many homes in such a small area? 40% of the new housing in a 5-mile area – a totally unjust proportion

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/85  **Respondent:** 15114657 / Jane Hill  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 2016 draft local plan for the following reasons:

[...]

7) I object to the lack of immediate provision for new schools.

8) I object to the lack of immediate provision for doctors surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/84  **Respondent:** 15114657 / Jane Hill  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6) I object to the lack of evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/86  **Respondent:** 15114657 / Jane Hill  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also have the following questions:

1) if the need for new houses is for local people, where are these people living currently?

2) if the homes are for local people there wouldn't be any impact of the current highways so why do we need extra junctions on the A3?

3) will the local prescribing drugs budget increase to accommodate the extra population or will the current budget be squeezed tighter? Meaning we live in a postcode lottery for critical medicines to treat critical conditions.

4) what about other local services which will be impacted? Vets, police, fire, ambulance, are there extra provisions for these?

5) how do traveller sites work? Is this a cash revenue for the council? If so where will this money be spent?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 2016 draft local plan for the following reasons:

1) I object to all erosion of the green belt as the village won't be the same.

2) I object to any removal of villages from the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/237  Respondent: 15114657 / Jane Hill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 2016 draft local plan for the following reasons:

1) I object to all erosion of the green belt as the village won't be the same.

2) I object to any removal of villages from the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/238  Respondent: 15114657 / Jane Hill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

3) I object to the disproportionate amount of development in one area of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/147  Respondent: 15114657 / Jane Hill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

4) I object to the limited consultation period.

5) I object to the last minute inclusion of new sites with less than 2 weeks notice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/88  Respondent: 15114721 / Leslie Macnair  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

7 I object to the lack of immediate provision for new schools

8 I object to the lack of any immediate provision for doctors' surgeries

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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6 I object to the lack of any evidence for the alleged housing need numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/239  Respondent: 15114721 / Leslie Macnair  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1 I object to all erosion of the green belt
2 I object to any removal of any villages from the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/241  Respondent: 15114721 / Leslie Macnair  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1 I object to all erosion of the green belt
2 I object to any removal of any villages from the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/240  Respondent: 15114721 / Leslie Macnair  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3 I object to the disproportionate amount of development in one area of the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/242  Respondent: 15114721 / Leslie Macnair  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3 I object to the disproportionate amount of development in one area of the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/148  Respondent: 15114721 / Leslie Macnair  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4 I object to the limited consultation period

5 I object to the last minute inclusion of new sites with less than two weeks notice

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/149  Respondent: 15114721 / Leslie Macnair  Agent:
Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4 I object to the limited consultation period
5 I object to the last minute inclusion of new sites with less than two weeks notice

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removal of Brownfield site (A34) from the Plan
Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to removal of Brownfield sites (A4) from the Plan

Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2311  Respondent: 15114721 / Leslie Macnair  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the increase in housing proposed in Tannery Lane (site A42)

This has been increased by a third since the 2016 version of the Plan. This will have a significant impact on the already highly congested local rural road network around Send. This is in contradiction to section 2.14a of the Plan which states “Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays.” And yet there is no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2301  Respondent: 15114721 / Leslie Macnair  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the extended development in the Green Belt (Policy P2, Site A43)

I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

I object to the allocation of 6 Traveling Showpeople sites in A34 Garlick’s Arch
The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlick’s Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.

I object to the potential and ill-defined increase in housing allocation at A43 Garlick’s Arch

The potential of an increase from 400 houses at site A43 Garlick’s Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2304  Respondent: 15114721 / Leslie Macnair  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the unfair imbalance of the Plan across the borough.

With the removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan has become even more biased against the North East of the borough. Guildford Borough is over 100 square miles. Of the 11350 homes proposed in the Plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2302  Respondent: 15114721 / Leslie Macnair  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A50

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Plan is self-inconsistent in respect of traveller sites.
A50 Whittles Drive, Normandy, shows on the Site details: “Allocation: The site is allocated for approximately 14 Travelling Showpeople plots ...” Clearly A50 more than covers the total “need” of 8, (page 40, 4.2.22.) and so no “need” exists for this in site A43. This and other inconsistencies in the Plan mean no decision can be made on the basis of this document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2307  Respondent: 15114721 / Leslie Macnair  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The inclusion of site A58 Burt Common, removes the need for A43 Garlick’s Arch)

GBC’s own reasons for including Garlick’s Arch A43 in the 2016 version were:

1. The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm, ... (site allocation A25) [ than the Burnt Common site did ]”

2. The site [A43] provides the employment floorspace needed in the plan to help meet identified needs”

Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (which are almost contiguous) are in the plan; therefore GBC are not following their own guidelines and objectives.

Since A58 Burnt Common is now in the Plan (2017) more than the “required” industrial space is available there, so there is no reason for Garlick’s Arch to be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2310  Respondent: 15114721 / Leslie Macnair  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposal for a Waste Management Facility in Green Belt (A58)

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the hiding of development by “deferment” (A24, A25, A26, A43)

This version of the Plan has concealed some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects:

i) to hide the number of housed actually being built (A24, A25, A26 – total of 1100 deferred, but still being built!) , and
ii) give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: *Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.*
So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses].” That has now been removed, thereby accepting that needing to make greater than normal profit IS to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp171/752  **Respondent:** 15114721 / Leslie Macnair  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I object to the lack of proper infrastructure planning for sites (A43 and A42)**

The Foreword to the plan by Paul Spooner includes on page 5:

"We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan”.

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp171/751  **Respondent:** 15114721 / Leslie Macnair  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object removing Send Business Park from the Green Belt (4.3.15).

Send Business Park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for its insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/92  Respondent: 15114753 / Lauren Pott  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object most strongly to the lack of immediate provision for new schools

I object most strongly to the lack of any immediate provision for doctors surgeries

I object most strongly to the lack of proper provision of natural resources such as water (four successive very wet winters have given us a short memory of hosepipe bans) and lack of infrastructure such as hospitals, recreation facilities, roads, waste disposal sites, sewage disposal, power generation, parking in shopping areas etc. Creating additional access to the A3 and/or the M25 is not increasing capacity – it will just add to intolerably congested and polluting roads. Minor roads are congested during rush hour and for much of the day, the approaches to J10, in addition to other parts of the M25 are intolerably congested at many times of the day and night, including weekends and even in the small hours when roadworks are being undertaken.

10) The quality of life and well being of existing residents is getting eroded year on year because there are simply too many people in the country, in the county and in the Borough. We have to say “NO”, enough is enough, we must look after existing residents better.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/91  Respondent: 15114753 / Lauren Pott  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object most strongly to the lack of any evidence for the alleged housing need numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I write in response to the revised Draft Local Plan.

1) I object most strongly to any and all erosion of the Green Belt

2) I object most strongly to any removal of any villages from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object most strongly to the disproportionate amount of development in one area of the Borough

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Answer (if comment is on questions 1-7 of the questionnaire): ()

I object most strongly to the limited consultation period

I object most strongly to the last minute inclusion of new sites with less than two weeks notice

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/135  Respondent: 15115073 / Niall Haughey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I note that there are 445 houses planned for Horsley in the area just north of the railway station. (Site allocations A38, A39, A40, A41).

I do not believe the Community Infrastructure Levy will be adequate to cover additional primary school places in Horsley, given an existing shortage of places for those in the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2152  Respondent: 15115201 / Katherine Mutton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I wish to OBJECT to the following: The new Conservative Council made a pledge that they would not INVADE THE GREEN BELT and you are planning numerous sites around Guildford and Woking which are currently in the Green Belt for development.

I attended the GBC meeting in May and was horrified at the lack of interest Councillors had to the views and wishes of local residents. Councillors have been elected to protect our interests and those of the community.

I OBJECT Consultation 2014 You have made significant changes to this document in respect of Burnt Common and Garlick’s Arch. These changes require another full consultation and currently the whole process is Invalid.

I OBJECT Garlick’s Arch There is no evidence that these vast areas of land are needed for Industrial Space and the huge housing numbers you are planning. The GBC’s Transport Assessment was not available to councillors and public at the meeting on 24th November. This is overload on houses and factories. This development would be far better placed at Slyfield. The impact on the A247 will be devastating.

I OBJECT to your plan to Remove Send from the Green Belt

This will just result in the village becoming an urban development of Woking. I object to the use of the land behind the School playing fields and the land at Cartbridge being removed from its protection. Send is a village and the residents do not want to live in a new town nestling up to Woking.

I OBJECT TO the development of land opposite Wind Ridge, on Send Hill for homes and Travellers Pitches being designated for 40 homes. This is a Landfill Site and was not included in the original consultation. The access to the narrow road (Send Hill) opposite the cemetery and the location of the village school nearby makes access difficult and dangerous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4275  Respondent: 15115201 / Katherine Mutton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the development at Blackwell Farm. This will cause a huge increase in traffic. It is already impossible to get along the A3 in rush hour and with the Cathedral, University and Hospital very close all requiring access this is just mad.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4273  Respondent: 15115201 / Katherine Mutton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45
| Comment ID:  | PSLPP16/9153  | Respondent:  | 15115201 / Katherine Mutton  | Agent:  |
| Document:  | Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1  |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  |
| Answer (if comment is on questions 1-7 of the questionnaire): ()  |

1. I OBJECT to the proposed development at Wisley. This will cause huge traffic problems on the A3 and M.25 in both directions. It is also located opposite the world famous Wisley Gardens which already brings a large amount of traffic to the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID:  | pslp172/815  | Respondent:  | 15115201 / Katherine Mutton  | Agent:  |
| Document:  | Proposed Submission Local Plan: strategy and sites 2017 / Policy A42  |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  |
| Answer (if comment is on questions 1-7 of the questionnaire): ()  |

The proposed infrastructure makes no mention of a larger Medical Centre - currently you have to wait 2 weeks for an appointment. Where are the schools to accommodate all these children?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to Policy A42 change at Clockbarn in Tannery Lane because:

- the unjustifiable increase in the number of homes is unacceptable
- Tannery Lane is very narrow and not suitable for the inevitable increase in traffic. It leads on to the A.47 which is a single lane A road to Woking and is already very heavily used. The junction will be busy and dangerous.
- there is no justification in the erosion of Green Belt. There are three further invasions of the Green Belt planned in this Plan 2017 - none of them justifiable.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/816  Respondent: 15115201 / Katherine Mutton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A43 Change Land at Garlick's Arch, Send Marsh because:

- It is a huge over-development of the village
- It will generate large amounts of traffic onto the roads leading to Ripley, Send and the A.247 to Woking.
- There are no exceptional circumstances that justify the size and increase in this policy
- It will make a ribbon development between Send and Ripley
- The proposed increase ignores all previous objections made by local people for the placing of all these houses on Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/817  Respondent: 15115201 / Katherine Mutton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 Land at Burn Common, London Road changes

- There are currently empty industrial sites available and there is a reduction in the demand for industrial land in this area.
- The traffic generated and pollution will affect the village of Send hugely.
- The wording has been changed from maximum in the previous plan to minimum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp171/96  Respondent: 15115201 / Katherine Mutton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Green Belt Policy 2 at paragraph 4.3.15

- It is unacceptable to take the Send Business Park out of the Green Belt as it paves the way for further unwelcome construction.
- Tannery Lane is narrow and the access to other roads is bad.

I wish my objections to be put forward to the Planning Inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5135  Respondent: 15115457 / Janice Kinge  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/252  Respondent: 15120129 / Anthony Merryweather  Agent:
I write to object to the proposed development of six sites in East and West Horsley. The proposal to allow the building of an additional 533 properties is completely unsuitable for this area. The area lies in the green belt, and there are also a number of conservation areas within the area, this is completely incompatible with the proposal. I appreciate the government is placing councils under pressure to build more homes, but the type of homes that will no doubt be built - if these developments are allowed to go ahead - will be identikit mini Surrey mansions, completely unsuitable for the sort of starter homes that are actually needed. This is because the developers will need to maximise their profits and starter homes don't do it for them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Respondent:</td>
<td>15120481 / Jonathan Barratt</td>
<td>Agent:</td>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

There is also the additional road traffic increase which is inevitable if you add 533 homes to an area. This in addition to the additional traffic that we are already going to have to suffer due to the Opera In the park development at West Horsley place.

The building of an additional 533 will also provide a precedent for existing homes to extended in line with the sort of mini mansions I describe above.

Small developments I do not object to. But I strongly object to the scale of the proposed sites and the number of homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I object, the green belt should not be built on.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SLP16/153  Respondent: 15120481 / Jonathan Barratt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I object to building on the greenbelt area that is already crowded and stretched for facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SLP16/154  Respondent: 15120481 / Jonathan Barratt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I object, this is not sould to build on our greenbelt when there are other brown areas that can be used.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SLP16/155  Respondent: 15120481 / Jonathan Barratt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I object. If cooperation was complete the greenbelts would not be considered as building areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Greenbelt areas around Ripley and Send being built on. These areas that are already crowded and short of schools, medical centres etc so should rightly be preserved. The Portsmouth road is already busy though route from the A3. Building more housing and industrial areas will increase this problem exponentially.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Housing

1.1. The target for new homes outlined in the Local Plan represents a 25% increase in the housing stock of the borough; The Office of National Statistics (“ONS”) projects a population increase (including that for economic growth) of some 15% for Guildford Borough over this same period. Why do we need the 25% increase in homes?

1.2. The infrastructure proposals are inadequate even to meet existing needs let alone the proposed additional developments in the Local Plan.
1.3. Policy S2: is a Borough Wide Strategy (the “SHMA”), which looks at how the annual housing target of 693 homes is made up. It estimates that 517 homes per annum arise from ‘the demographic figure (supported by ONS office national statistics) projections. To this GBC plan has added another 120 homes per annum in order to ‘support extra economic growth’, a further 31 homes per annum to ‘improve affordability’ and 25 homes due to ‘student growth’, all of which totals up to 693 homes per annum target more than in the rejected plan.

1.4. This does not make any sense as we do not need an uplift for extra economic growth. Current growth patterns are included in ONS projection.

1.5. The increase of 25 homes to ease affordability issues will result in only 10 social/affordable houses being built. It would be better if planning permission was only granted for 1, 2, 3 bed properties for a period of 2 - 3 years with a restriction on the percentage of 4 & 5 bed if required. This would help to provide a better mix for both market and affordable homes in all parts of the borough.

1.6. Student accommodation should be provided by the university. The University’s expansion should be in line with what it can deliver in terms of extra student accommodation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/145  Respondent: 15120641 / Elizabeth Wolfe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Wisley Airfield

3.1. The proposal to include this site in the Local Plan and remove it from the green belt is puzzling as it was the subject of a planning application refusal in recent months.

3.2. The reason given for the refusal was because the site was within the Green Belt. So why do that when GBC had the clear intention of moving the site out of the Green Belt within next few weeks? There were other reasons that were glossed over in the report that are not resolved by GBC recent actions. The impact on infrastructure, which is clear for all to see, only gets a passing mention. For example, the transport report by the developer's consultants has been torn apart following many comments and objections. Missing traffic numbers, grossly understating the impact of the development on trunk roads and local roads. The information provided in the Local Plan implies that if billions are spent on road and transport network improvement the development at Wisley could proceed with improvements funded by developers.

3.3. There appear to be 58 projects included in GBC wish list; statements have been made that for the housing program to move forward, it would require the majority of the programme of work to be delivered. At this point in time only 4 of the 58 projects have received committed funding even one of these is in doubt if Highways England is to be believed.

3.4. No solutions have been arrived at for the problems in the centre of Ripley. After more than 2 years of meetings and discussions involving SCC and the developer's consultants no workable solution has been identified. GBC local plan dismisses this significant problem saying it will be resolved with a "management solution". I would be very interested to hear what that solution could be and I suspect SCC highways would also be interested.
3.5. Both Highways England and SCC Highways issued holding objections in relation to the recent planning application for the Wisley site. This is, apparently, all they can now do as they are unable to refuse an application. If these two key agencies have expressed their grave reservation over the potential development on this site, why do GBC insist in promoting the site?

3.6. Under the latest Housing and Planning Bill, if sites are included in a local plan there is a presumption in favour of an application with matters of detail only to be resolved. Large slices of GBC traffic solutions are based on survey and analysis yet to be done when more detail can be made available. In other words they do not know the full extent of the problem. This information will be the result of a further examination of the issues and with solutions that are not currently apparent. I suppose this is the reason for the vagaries of the budgets. The only beneficiary of such an ill conceived and ill prepared approach will be lawyers representing the future developers when they are asked to pay for or contribute towards any mitigation.

3.7. The budget costings are said to err on the conservative side. Worked out on the back of a fag packet is more the case! How can anybody be expected to take a budget plan seriously when the individual projects have a budget plan estimate in the range of £100m to £250m on a single project. It is no wonder only 4 of the 58 projects have any commitment.

3.8. There are serious environment issues on the Wisley site and the nearby SPA. Pollution levels already exceed EU levels. The proposed SANG provision is immediately adjacent to the SPA a point that was criticized by Wildlife Trust, and Forestry Commission and initially by Natural England. The latter making a reversal of earlier comments following changes in personnel.

3.9. I therefore Object to the Wisley Airfield site being taken out of the Green Belt where it continues to serve the purposes intended by its original inclusion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/255  **Respondent:** 15120641 / Elizabeth Wolfe  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1.7 GBC Affordable Housing Policy H2 is proposing that all development sites (other than those with less than 10 units) will be required to have 40% of their homes offered as affordable housing. This to be on all site irrespective of where they are or where the homes are most needed. Local authorities are able to take payments in lieu from developers, but GBC have rejected this option. Why? This “one size fit all” policy will mean that homes will be built where they are not needed and not enough will be built where they are needed. Developers are therefore able to influence the level and type of affordable homes built. The housing mix in the Local Plan suggests more 1-bed homes should be built than 2-bed. GBC have ignored the figures from their own needs data (where more 2-bed homes are needed) in favour of those produced by their external consultants report. These reports have been influenced not by sound internal data from their housing records but by the vested interests of the development lobby. The only changes that can be made to the number on each site is at the developers discretion and at their request. GBC are unable to promote changes.

1.8. If any affordable social housing is built in a village like East Horsley and on most of the sites in West Horsley they could be lost to the market as there is no rural protection against the right to buy or enfranchise.

Page 2237 of 2855
1.9. Most of the social housing in EH has already been lost as a result of right to buy. GBC should take payment in lieu from developers and build the social affordable home in more urban areas where they are most needed.

1.10. GBC’s new policies will encourage the buy to let investors who will receive a good return on their investment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/256  Respondent: 15120641 / Elizabeth Wolfe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.11. POLICY H3: Rural exception homes are required on a small scale and can be retained as affordable and built on the edge of village and have significantly less impact on the Green Belt.

1.12. I therefore object to the proposed housing numbers and policies based on the above points.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/257  Respondent: 15120641 / Elizabeth Wolfe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Green Belt

2.1. Proposed Submission Local Plan includes the statement “We will continue to protect the Metropolitan Green Belt”. No this is not the case. The housing policies set out in the Proposed Submission Local Plan; indicate that 65% of proposed new developments will take place on land that is currently in the Green Belt.

2.2. Under NPPF regulations GBC and other Local Authorities are permitted, once they have determined their Objectively Assessed housing Need (OAN), to make allowance for factors which may constrain the delivery of new housing. Constraints such as the need to protect the Metropolitan Green Belt, or the restrictions required to protect the Surrey Hills Area of Outstanding Natural Beauty, or land costs etc. Although these designated areas make up a large proportion of the
land area of Guildford Borough, GBC has made no attempt to reduce its housing numbers in order to take account of such constraints. They have instead increased the number, beyond that required for normal growth projections to satisfy their own egotistical view on a path of massive economic growth.

2.3. Currently development is permitted within the settlement boundary, where villages are washed over by the green belt with particular planning regimes being applicable that have proved beneficial in preventing the urbanization of many villages. They are very successful, because of the non urban nature of small scale new development to help to retain the openness of the villages. These villages house, in some cases, a population of 4000 plus people, yet are regarded by residents as small villages. For those who drive through these areas they do not see a mass of urban style developments but trees and hedges, views between homes, views through spaces that don't reveal row upon row of homes but space and openness with trees amongst the homes and a variety of scale and architecture.

2.4. Washing some of the larger villages will result in them becoming their own urban sprawl as a result of disproportionate infilling.

2.5. Changes to settlement boundaries have been made in order to make more land available for the developers under the guise of making the boundaries more defensible. Many straight lines have now been drawn which result in villages developing hard edge profiles with buildings replacing the fragmented softer edge of the original hedgerows, trees and green fields.

2.6. Loss of Green Belt resulting from these boundary realignments can only be justified in exceptional circumstance. None of which have been provided. Moving a boundary from one already defined boundary to another, again can only be done in exceptional circumstance. Housing need has already been turned down as such an exceptional circumstance.

2.7. I object to all these changes being made to the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/269  Respondent: 15122049 / Rebekah Day  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. Disproportionate size of sites in relation to rural locations
I object to the allocation of land to the strategic sites of Wisley Airfield, Garlicks Arch (Ripley/Send border) and Gosden Hill (Clandon). The proposed development of these sites will have a disproportionate impact on the surrounding local villages. They will have a permanent impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/271  Respondent: 15122049 / Rebekah Day  Agent: 

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1. **Congestion on the trunk roads, A3/M25**  
   I object to the development of the strategic sites due to A3 and M25 already being at capacity during peak hours. Highways England has no plans to look at improving the A3 before 2020. It is therefore not sustainable to identify sites for further development which will worsen the congestion on these motorways and trunk roads.

2. **Congestion on the local village roads and lanes**  
   Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. I object to further development which will cause greater congestion in and around our villages.

3. **Unsuitability of our local roads for heavy vehicles and more traffic**  
   Many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

4. **Poor air quality concerns**  
   Further congestion, particularly in built up residential areas will only lead to greater levels of air pollution. I object to further development, which will result a fall in the air quality.

5. **Lack of proper infrastructure planning for sites**  
   I object to the lack of planning and implementation of infrastructure. For example at Garlick’s Arch. Without improvements to the infrastructure prior to development, the existing residents’ quality of life will significantly deteriorate in many ways. How will the local services such as doctors and schools cope?

6. **Lack of Utilities Capacity**  
   Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. I object to the development of Garlick’s Arch on the ground that there is little capacity in these networks.

7. **Sites being planned in unsustainable locations**  
   Many of the strategic sites e.g. Wisley Airfield and Garlick’s Arch, are in unsustainable locations. They do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. I object on the grounds that these sites are not sustainable.

8. **Parking issues in local villages caused by larger population**  
   Many of the affected villages, such as Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems. To which I object.

9. **Local healthcare facilities will be overwhelmed**  
   Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. I object due to the further stress it will put upon existing health services.

10. **Local policing facilities will be overwhelmed**  
    Police services are seeing funding reduced. The development of the likes of Garlick’s Arch and Wisley Airfield will stretch the police services further and I object.

11. **Local social welfare facilities will be overwhelmed**

12. **Local shops/restaurant facilities will be overwhelmed**

13. **No protection of heritage assets**

14. **No protection of the environment**

15. **1 Overdevelopment of sites**

16. **Not meeting the needs of local communities**

17. **Insufficient affordable housing**
18. Poor quality of layout and housing design
19. Insufficient consideration of SPA, SSI and Conservation Area issues
20. Lack of proper cycle lanes on local roads
21. Lack of proper pedestrian footpaths on local roads
22. Current SHMA figure of 693 p.a. too high

Personally, I drive down a lot of these roads everyday on my commute to work. They already suffer from huge amounts of congestion and also large vehicles using narrow lanes to the point they almost bully smaller vehicles off the road. Therefore I strongly object to this proposal.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/268  **Respondent:** 15122049 / Rebekah Day  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

1. Not protecting the Green Belt
I strongly object to the proposals to remove Woking, Ripley, Send, Horsley and Clandon from the Greenbelt. There are no special circumstances to do this. Once taken the green belt is lost forever.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/270  **Respondent:** 15122049 / Rebekah Day  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

3. Unbalanced allocation of development in one area of the Borough
Between the M25 and Burpham, a distance of only about 5 miles it is proposed that over 6,500 houses are built. This represents over 40% of the housing proposed in the Local Plan. I object to this area being hit so hard by the allocation of development, which is disproportionate to the rest of the Borough.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/150  Respondent: 15122113 / Lauren Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to express my very strong objection to the draft proposal for Garlicks Arch in Send Marsh.

As a resident of the Send Marsh area I object to these proposed plans as I feel strongly that the proposed plans are completely disproportional to the size of the Send and Ripley village area and will irreparably damage the character of this small village community.

In addition, this small village does not have the facilities or infrastructure to support such a vast increase in the population. The area is already unable to cope with the traffic in peak travel times and additional housing will create even more pressure on our struggling roads. The roads through Send, Ripley and Clandon are very narrow and bendy and already struggle during rush hour. Parking is a very big concern in the area already with many cars parked out in the road making it difficult for cars to move through the area and for cyclists to use the roads safely. The area is poorly served for public transport, the nearest train station is 50 minute walk and buses are expensive and only operate twice an hour (if you are lucky!).

The local area is not equipped to support an increase in demand for local services such as schools and the doctor's surgery. It is already challenging to obtain an appointment with my GP.

I have lived in this area all of my life and greatly enjoy the small community atmosphere of this area. The proposed plans are excessive and completely disproportionate for this rural community and the damage caused by this proposed plan will irremediably damage the area and its natural beauty. The area proposed for development is an area I regularly walk around and it would be gutting to think this area will no longer be the same.

I hope you take my objection into consideration and I would appreciate receipt of my email so that I know my views have been carefully considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/102  Respondent: 15122177 / Madeleine Shillaker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley
I object to the council plan for development in the Ripley Green Belt and development on Garlick’s Arch.

My reasons for objection are:

Destroying the Green Belt – the areas of Ripley, Send and Clandon should not be removed from the Green Belt. It will have irreversible effects and defeats the whole point of having a Green Belt! Green Belt should be protected, not moved, de-classified and destroyed.

The proposed development of these sites will cause a significant increase in air pollution and have a detrimental impact on the environment. It will have a disproportionate impact on the surrounding local areas – causing irreversible problems for the local community and those who use the facilities and enjoy the open spaces there today.

Development of Garlick’s Arch will have a huge detrimental impact on traffic in the local area. The roads are not suitable for heavy traffic. Traffic congestion will be severe – these areas already struggle to cope with traffic, it’s a careful balance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td>I would like to raise an objection to the proposed quantity of new housing planned for Horsley. I live on Ockham road North and have extreme difficulty trying to get my 2 children to different schools. There is no parking at the Raleigh school and no pavements so the children take their life in their hands dodging cars whilst they have to walk on the road. My elder daughter went to the Howard and her bus picked her up once again on a road with no pavement so the children were standing on the dirt in a dangerous position. The space for parking at the doctors and the village is also inadequate. Where are all these people going to go to school and Doctors etc? There is just no structure in place for this increase in numbers. I do not object to affordable housing in small amounts but not this many.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to Policy A43. Land at Garlick's Arch, Send Marsh/Burnt Common &amp; Ripley, designated for 400 houses and 7,000 sq.m of industrial &amp; warehousing. This site is new and was not included in regulation 18 draft. It has not been consulted upon previously. It is Green Belt permanently protected by the NPPF which prevents the merging of settlements. There are no exceptional circumstances. The proposed industrial development is not required since the latest ELNA 2015 assessment shows a reduction of 80% in required employment floor space from previous plan. If needed, this development should be at Slyfield.</td>
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<th>Comment ID: PSLPS16/155</th>
<th>Respondent: 15125729 / Irene Burrows</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction</td>
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I object to Policy 43A. A 4 way interchange on to the A3 at Burnt Common. This would increase traffic through Send & Ripley from the A3 to Woking and to the M25 when there are problems on the A3. The villages would be gridlocked with traffic, already heavy at peak times with school runs and rush hour journeys. Lack of infrastructure and forethought.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/156  Respondent: 15125729 / Irene Burrows  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

I object to the last minute inclusion of this policy into the local plan. The revised plan submitted to the GBC Executive in April lowered the housing in Send to 185, the Garlick's Arch proposal added in May increased the number to 485 and will cause pressure on the local medical centre and school, neither of which has capacity for such large increases.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/273  Respondent: 15125729 / Irene Burrows  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

I object to the removal of Ripley, Send, Sendmarsh/Burnt Common from the Green Belt. This encroachment by the council has not been rigorously justified as required by the Planning Minister. They provide a buffer between Woking and Guildford and their removal would cause real harm to charming and picturesque villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPS16/157</th>
<th>Respondent: 15127649 / Neil Blaydon</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45</td>
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<td>1. I OBJECT TO site A45 The Talbot. This is overdevelopment in a conservation area.</td>
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<td>1. I OBJECT TO the lack of immediate provision for new schools.</td>
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<td>2. I OBJECT TO the lack of any immediate provision for additional doctors surgeries.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
1. I OBJECT TO all plans to erode the Green Belt.
2. I OBJECT TO site A43 Garlicks Arch. This site is unsuitable for the proposed development.
3. I OBJECT TO all proposals for the removal of villages from the Green Belt by "in-setting".

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Answer (if comment is on questions 1-7 of the questionnaire): ()

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<th>Comment ID: PSLPS16/158</th>
<th>Respondent: 15127681 / Claire Long</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A40</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In particular I should like to OBJECT to the Waterloo Farm site (policy A40), given the impact that this will have on Green Lane as a single track road wholly unsuited to the increased volume of traffic that will inevitably result from it being used as a cut through by the residents of the new homes, together with the more general impact on the quiet rural character of the immediate vicinity. I am also concerned by the build-up of traffic on Ockham Rd North that will result from those coming from the A3 queuing to turn right into the site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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I should like to OBJECT to the new local plan for East & West Horsley, published on 6th June 2016 as I feel the plan as a whole is unfairly skewed towards an essentially rural portion of the borough that lacks sufficient infrastructure (particularly roads, medical facilities and primary schools) to support this proposed level of development, particularly when taken in the context of the threat of the Wisley Airfield development which remains an overhang on the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/280  Respondent: 15127713 / Emma Connors  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of immediate provision for new schools.

I object to the lack of any immediate provision for Doctors surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/278  Respondent: 15127713 / Emma Connors  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to all erosion of the Green Belt.
I object to any removal of any villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate amount of development in one area of the borough.
I object to the limited consultation period.
I object to the last minute inclusion of new sites with less than two weeks notice.
I object to the lack of any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<th>Comment ID:</th>
<th>PSLPA16/1167</th>
<th>Respondent:</th>
<th>15127777 / Keith Hammond</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Housing need and EU referendum

It is stated (quite reasonably) in section 1.16, page 10 of the Local Plan, Strategy and Sites that development must be based upon ‘up-to-date and relevant evidence’.
Because of the EU referendum result this clearly can no longer be the case. Population changes can only occur because of differences between birth and death rates (which is currently close to zero) and/or net migration into the area. Following the EU Referendum there will almost certainly be a significant change to this figure, particularly being located so close to London. So the evidence cannot be based upon up-to-date and relevant information.

In addition the actual calculation has been kept secret from the residents of Guildford so it has been impossible for residents to verify that the data and calculations are correct, even before the latest changes in circumstances. No decision should be allowed before ordinary residents have a chance to scrutinise and challenge the validity of data and assumptions made.

Students

There has been considerable discussion on the availability of student accommodation on University land and that the University is not making the most of what is available. The plan also assumes that 60% of students will be accommodated within campus which implies 40% will not be.

If this accommodation was made available at the University it would solve multiple issues simultaneously and make the Local Plan so much less damaging. Presumably the vast majority of students not living on campus are living within Guildford Town itself and in affordable housing. The releasing of this housing would reduce the number houses needed to be built, the houses released for accommodation would almost certainly be 100% affordable housing and in the locations that are most often required. In addition it will have no or little impact on infrastructure (unlike other developments), in particular transport, and students would be on site in more appropriate accommodation, with the additional benefit of a reduction in travel and transport congestion, which is clearly a truly sustainable approach.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1168   Respondent: 15127777 / Keith Hammond   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My Local Village (West Horsley) and Surrounding Area

Above I have focused on Guildford wide issues. Below I will focus on issues very specific to where I live. However when looking at issues in my location it appears that there is very little detail or consideration of problems and issues that the Local Plan could raise. If the plan is approved and the houses built, those issues will then have to be solved. Rather than consider those issues now and come to a sensible solution now we will be faced with a series of disasters for which dramatic solution will have to be found. This is inappropriate and unnecessary.

As it is clear that in my area a number of these exist (surface water flood identified but no solutions identified, 35% increase in housing, but no schooling provided, existing traffic jams not identified, etc) then it is reasonable to assume there are many more of these issues in other areas of the borough which I will not be aware of as they are not local to me.

In addition there are so-called solutions to other problems/issues identified in the plan that are just a few words with no substance behind them whatsoever. I will give some examples below. In several of these cases I have sought further information from the Council and there isn’t any further detail. Saying there will be a traffic management system, or a
SANG is of no use whatsoever if there are no details. It doesn’t have to be comprehensive at this stage, but it has to be more than a few words!

We need to know what the problem is and an outline of the solution as otherwise it could be that an insolvable problem is being created or a problem created that can only be solved by a very damaging solution.

When it comes to the Wisley site the interface with the A3/M25 and the impact on surrounding villages could be catastrophic yet very glib solutions are provided or missed altogether.

The plan gives an impression that the council has been told it will build ‘x’ number of houses, has accepted it and creates a plan to fit the numbers regardless of how damaging or impractical it is.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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**Wisley**

Very recently GBC gave 14 reasons for disallowing the planning application for a significant development at Wisley. Some of the reasons given were either insurmountable or insurmountable for all practical purposes. Yet having rejected this development Guildford Borough Council then, within weeks, includes it in their Local Plan.

How is this possible? There is no logic whatsoever in an organisation whole heartedly rejecting a proposal to then include the same proposal immediately in its Local Plan. Something cannot be fundamentally wrong for 14 reasons and yet be perfectly all right simultaneously.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Density of housing

The density of housing proposed on all sites is completely out of character with the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Primary and Secondary School and the order of build

We live a few hundred metres from The Raleigh School. When we moved here in 2011 there was not a place at The Raleigh for our daughter. There was also not place available at any Primary school in the area, which meant (fortunately for us) that The Raleigh then had to take our daughter, plus 2 other children in her year that had moved into the area at the same time. So in 2011, in my daughter’s year, every single primary school was up to full capacity and exceeding their numbers.

As is very well known, a similar issue exists with The Howard of Effingham Secondary School. The school is at full capacity. Similarly George Abbot, our nearest alternative school, is also at full capacity and consequently its catchment area never reaches Horsley.

So where do the children go to school if 533 new houses are built in East Horsley and West Horsley?

When I raised this issue with GBC officers at one of the open days I was told that the new schools at the Wisley site would provide the extra capacity. I challenged that on the basis that it seemed reasonable to assume that the Wisley Development would take some time, in particular with the infrastructure issues and not least the A3 access, and that some or all of the Horsley sites (and sites around other nearby villages) would be completed first. The officers agreed this would be the case.

So again I asked “Where do the children go to school?” I received no answer other than a shrug of the shoulders!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Further future expansion

It is hard not to assume that the increase in housing proposed in West Horsley and East Horsley will then require significant additional ‘facilitating’ development to support it, resulting in yet another ‘exceptional’ need to build in the new Green Belt areas again. Obvious examples are:

Primary school: As mentioned above The Raleigh School will not be able to cope if the proposed residential development goes ahead as proposed and there isn’t room for expansion so a new school will be needed. Where?

Roads: All the roads in West Horsley are in fact lanes containing at most one pavement and therefore unsuitable for a 35% increase in housing. How will this be addressed?

Station car park: In addition to the village car park the Station car park also won’t cope. The station car park is at full capacity so certainly won’t cope with increased numbers. Where will the commuters go?

Doctor’s surgery: Is also close to, if not at, full capacity. How will this be resolved?

Where and how are these issues to be resolved?

It is hard not to come to the conclusion that we will then be into another round of ‘Exceptional’ need to expand again into the Green Belt, which is unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/4517  **Respondent:** 15127777 / Keith Hammond  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**Effingham Common Road**

My daughter goes to Howard of Effingham School by bus. Occasionally, some mornings, I may have to take her in. Effingham Common Road from the school to Effingham Junction, in direction of Wisley, is usually a solid traffic jam for its whole length (over 1 mile) at this time in the morning, although it does move steadily.

As I turn off onto Forest Road (when coming home) I do not know what the road is like once it becomes Old Lane, but presumably the traffic is still very heavy. These are country lanes. Clearly building a village/town of 2000 plus houses between this traffic jam and the A3 will have an enormous impact.

When I raised this issue, specifically with a GBC officer specialising on transport, at the East Horsley open day, he confirmed that they were completely unaware of this issue!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Wildlife corridor

The developments A38, A39, A40 and A41 will have a significant impact on wildlife movement. Open areas are being boxed in between A41 and A39 and the railway line. A38 removes the link between the open areas on one side of it and the open area the other side of East Lane. Currently only one row of houses exists which forms a very limited barrier to wildlife. The development of A38 will make a solid barrier. The same is true for the open countryside either side of A40.

Water pressure

The water pressure in East Lane is demonstrably poor. I also understand that the waste systems are struggling to cope. As the Local Plan is proposing a 35% increase in housing in West Horsley this, surely, is taking these facilities way past their breaking point.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please find my detailed OBJECTION to the Guildford Borough Proposed Submission Local Plan: Strategy and Sites 2016 below.

I’m going to respond regarding my objection in two parts. Firstly the overall plan and secondly issues that are relevant to my local village, West Horsley, and surrounding area.

Overall Plan

Green Belt

The plan states that ‘National planning policy requires that Green Belt boundaries are only amended in exceptional circumstances’ and ‘We consider that exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development’

The development that is needed in the borough is a result of normal growth and should be catered for in the normal way. It is not ‘exceptional’ it is normal. It is not due to a new airport, railway line, etc, etc it is just ‘normal’ evolution of the area.
The purpose of the Green Belt is to provide protection from urban growth. If it can be removed to provide for urban growth, that is a tautology!

The plan also tries to argue that some of these locations should not have been ‘washed over’ by the Green Belt in the first place and as per the wording in the plan ‘other development management policies used to restrict any inappropriate development’ in these places.

However other development management policies are not being used to restrict inappropriate development. That requirement is being completely ignored. If these areas are removed from the Green Belt on the basis of this technicality then they should be protected by those other development management policies. Why aren’t they? Why are villages like West Horsley being immediately faced with an increase of 35%? Clearly the alternative protection as defined in the plan is not being applied as required.

Also the new Settlement / Green Belt Boundaries going around the villages that are now being proposed to be inset are, as to be expected, generally hugging the main settlements. However, every so often, the boundary extends out into open countryside and then back again for no explicable reason. It is of no surprise that where it does this are the proposed development sites. This is a cynical opportunity, when insetting these villages, to include open countryside in them that clearly would have, and should have, been in the Green Belt in the first place. It is blatant opportunism when changing the designation of these villages by including lumps of countryside within their Settlement Boundaries. If the villages were not washed over by the Green Belt originally these areas which are now included in the Village Settlements would have been in the Green Belt and untouchable I will cover one specific example in West Horsley below.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4514  Respondent: 15127777 / Keith Hammond  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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Answer (if comment is on questions 1-7 of the questionnaire): ()

Setting of the Green Belt / Settlement Boundaries

If West Horsley is no longer being washed over by the Green Belt then the new boundaries need to be set carefully. I don’t believe I am being cynical when I notice that the new boundary (as one would expect) hugs the settlement closely except in the areas where development is proposed. At these places it goes into open countryside exactly replicating the development plots.

If West Horsley had previously been inset and not washed over by the Green Belt then these boundaries would have been along the edge of the settlement and all these proposed development sites would have still been in the Green Belt and not available for development.

To take the worst example – Site Allocation and Policy A41. It takes great imagination to put the Settlement / Green Belt boundary around this plot and not along the opposite side of East Lane where it clearly should be.

How on earth can anyone think that the Green Belt boundary that runs along East Lane on both sides of this plot should suddenly, for no explicable reason, suddenly bulge out and go around a piece of completely open countryside. Could it have anything to do with a proposal to build 90 houses here?
**Villages Merging**

I notice in the plan that effort is made to ensure villages don’t merge at Ash/Tongham/Ash Green by the addition of new Green Belt. I understand this is something where great effort is being made to avoid coalescence and of course the Green Belt that operated over West Horsley prevented exactly that from happening here. Yet the plans put forward are now apparently encouraging coalescence in West Horsley.

It should be noted that the political/parish boundaries of West Horsley do not represent the physical structure of the village. There are two distinct parts.

There is the original village of West Horsley, including the conservation area, with its own amenities (shop, hall, pubs etc.) and this is entirely surrounded by countryside. The Street goes through the centre of it.

When The Street becomes East Lane (at the junction with Long Reach) this is the start of the rest of West Horsley (where I live). This northern part of West Horsley is actually contiguous with East Horsley and not attached to the more historic part of the village at all. It does not have its own amenities and we tend to use those in East Horsley. This part of West Horsley, around East Lane, is distinct and separate from the original village of West Horsley.

The development proposed on East Lane (Policy A41) is starting that creep of development towards the village part of West Horsley and should not be allowed. The older part of the village of West Horsley should keep its unique identity and not be merged in with East Horsley and the northern part of West Horsley.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Surface Water Flooding**

I am acutely aware of Surface Water Flooding. When we moved into West Horsley in 2011 we were then unaware of any flooding risk, after all where we live in East Lane there are no rivers.

Since moving to East Lane (less than 5 years ago), East Lane has flooded several dozen times during heavy rainfall, through the failure of systems to take surface water away. The road completely fills. Because of the upward slope of the pavement at our house it has not yet gone over the edge into our drive. If it did we would be badly flooded as our drive slopes down to the house by several feet so we could be under many feet of water if this happened. We have come close so many times.

This is a very serious problem in the Horsleys. It is not just our road. We have had a car written off due to local surface water flooding in West Horsley and have had to be rescued by the Fire Brigade. Not a good record for less than 5 years here!

Clearly the additional plots in West Horsley will have a huge impact on this situation and each one has surface water flooding identified as an issue in the plan.
However, to my amazement, when looking at Appendix C under Surface Water Flooding there is not a single proposal for West Horsley. That is mind boggling!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4519  Respondent: 15127777 / Keith Hammond  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

East Horsley village shops and local parking

East Horsley Station Parade village shops provide a vibrant selection of shops. Parking here is very well balanced. It is operating at nearly full capacity much of the time, but usually it is possible to find a parking space. Occasionally you may have to drive around a loop a second time, but even if full someone is usually leaving as you arrive.

533 extra houses in the two Horsley villages will render this in operable. It must be obvious that the addition of only a few extra cars at any one time will tip the parking over the limit and it must be completely obvious to anyone that 533 will introduce more than this at most times of the day.

In addition it is completely naive to think that the 2000 plus new homes at Wisley will all leave the new location via the A3/M25. They will clearly clog up East Horsley and West Horsley (as well as Cobham, Effingham, Ripley, etc, etc)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/814  Respondent: 15127777 / Keith Hammond  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Previous feedback ignored

The revised Local Plan says it took onboard the submissions made following the previous Draft Local Plan. This is absolute nonsense.
The Draft Local Plan had an unprecedented response which was almost unanimous in rejecting the plan in almost its entirety as being fundamentally flawed. The subsequent amendments made to the plan were miniscule tinkering at the edges. To even suggest such a claim that the submissions made were taken onboard is absurd.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1474  Respondent: 15127809 / A W Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5929  Respondent: 15127809 / A W Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a totally unrealistic number of houses for the country lanes to absorb.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/296  Respondent: 15127809 / A W Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Introduction: The policy A44 refers to new development of green sites which are recovered land fill sites after the closure of Sand Quarries. A major part of this site is currently privately owned by a person who bought it to protect the area from over development in 2002.

The other part is owned by GBC and to date has been left as an open space for the enjoyment of the local community. At the northern end is another piece of land which is owned by a traveller family. There was some consternation some years ago when the travellers set up unauthorized pitches on the land which is covenanted against such use and development. The incomers were evicted with the authority of the council and a deep trench was created to prevent any further incursion. This land is locked in on all sides by public footpaths and there is no vehicular access.

The landfill system won an award and it is well vented and monitored for methane and other pollutants. It is said that before the landfill was capped off, a large quantity of asbestos was dumped on the top level.

The residential setting to the east of these lands provides high quality housing through 57 properties and there is also a cemetery which is in regular use. The road to the junction with Potters Lane is narrow and is often congested at peak hours with traffic to the school at the northern end of Send Hill. The Junction is dangerous as cars and other vehicles.

It is proposed that policy P2 would remove Send from the Green Belt to allow for the scale of development that GBC seeks.

I object in principle to this proposal which threatens to change the life of the village residents through over-development and pressure on local resources in health and education. This is an unjustified imposition on local people who will see no benefit to the wider community but certain profits for the developers.

There is already a pattern of through traffic congestion which will be predictably worsened year on year as there is a high local dependency on private cars for people to access their place of work in the local towns. The impact on vehicular pollution levels need to be evaluated as there is strong evidence that such patterns of congestion at peak times when children are starting the school day creates such an impact on their health and development which must not be ignored.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5932 | Respondent: 15127809 / A W Baker | Agent: |
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

I object to the 2016 Draft Local Plan as i t has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

Response to changes in the local plan affecting site A44 -

Land to the West of Winds Ridge.

I live opposite the proposed development site and have done so since 2003. This piece of green belt provides considerable amenity for those seeking refreshment, opportunities to exercise themselves and many dogs during the course of the day. Many runners and walkers, some very elderly currently use Send Hill as a quiet place to exercise during the day in spite of the lack of pedestrian facilities. Send Hill is a narrow country road beyond the cemetery and traffic already builds up in the school rush hours with heavy parking related congestion during those times, especially near the schools at the north end.

Whenever there are traffic flow problems northbound on the A3 people with local knowledge will use Potters Lane and Send Hill as a diversion to bypass the problem. Traffic volumes will increase considerably at those times.

The parish council also note that the users of the cemetery, both for multi-denominational funerals as well as regular visitors will be adversely affected by the inevitable increase in traffic and noise of passing vehicles.

The school bus and HGVs accessing Send Hill via Potters Lane are often seen to have difficulties in negotiating this narrow road especially in attempting to pass each other in opposite directions – which is often hard enough for two or more cars.

There is little scope for improving the infrastructure. There is no public transport available and the road to the village may prove to be unduly hazardous to pedestrian families with young children who may be tempted to buy affordable houses on low incomes while affording one or two family cars to add to the congestion. It is well over 1.5 miles to the shops, such as they are, and the GP health centre and pharmacy are as far again in the opposite direction along Send Barns Lane. There is a public footpath which connects to the recreation area but with cuts in council expenditure the maintenance is wanting and in poor weather the path becomes unsuitable.

The proposal to build 40 affordable houses at A44 suggest an intensity of development in a poorly resourced area which the Parish Council has deemed unsuitable for this level of development on several grounds including the failure of the proposing Council to supply evidence of need objectively. The council is bound to take a view on the impact on the environment as well as aspects of community welfare on a range of issues.

The land which is owned by the council at this point is a former landfill site and it is known that a range of asbestos products have been dumped towards the end of the site’s usage. It seems to me to be unnecessary to add to risk of contamination during any development work and the council has not addressed this issue as far as I know. Dealing with such a risk would increase costs and may render the whole project unaffordable!

**Provision for two Traveller sites.**

This proposal includes the facility to keep large fairground machinery and transport vehicles on the site with the implication that this will become a major feature of the new landscape. We see that other traveller sites are proposed in the local area and it would be interesting to know if the travelling community has been consulted about their preference to have sites close to each other rather than separated in this way.

In historical terms, there is a piece of land in excess of one acre at the north end of A44 which is owned by a Gypsy family who attempted to gain access across the land owned by the Council. They were evicted as the council did not approve of
such use of the land. A large ditch was dug to prevent further intrusion and the wooded area left unused. It is understood that the current owner who lives in W. Sussex does not support this proposed use of land adjacent to hers.

Our view is that such a proposal would bring about such a fundamental change in the environment and bring an unwanted impact on the current settled community simply because of the nature of what is proposed.

In summary – we object to all the provisions proposed in the allocation for A44 and we support the position of the parish council who have determined that such an allocation is un-necessary and that the land identified is unsuitable for such an intensive development because of infrastructural deficiencies, lack of amenity to support such an explosion of population in a small part of the parish. It would also impact on the current usage which so many people enjoy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/159  Respondent: 15127937 / Alan Burrows  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A21

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support this policy of retaining the land for allotments. It is important for the local community and the road infrastructure cannot support the extra traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/284  Respondent: 15127969 / Jean Fawley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of provision of any extra services or provisions that would be needed for any proposed large building development.

There seems to be no provision for the extra doctors surgeries, schools or roads to take in a huge amount of extra traffic expected if these developments go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<tr>
<td>I object to the local villages of West Clandon, Ripley and Send being part of a massive building program.</td>
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<td>I object to any proposal that these villages and surrounding areas being taken out of the Green Belt.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to the limited consultation period.</td>
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<td>I object to the lack of any evidence for the alleged housing need numbers.</td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley</td>
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As a resident of East Horsley, I am shocked at the idea of changing the Green Belt designated areas around the villages. I hope this is a mistake and will not happen.

We live in one of the most beautiful parts of the UK, one of the most important playgrounds outside the M25 for space, peace, and recreation. It is no mistake that we have many areas of outstanding natural beauty, nor that the Green Belt is there to keep this area distinct and discrete from the M25 and London conurbations.

My views are that the Wisley development is not the best option for the whole Guildford area, in that it destroys that natural break, and creates pressure on existing villages in terms of traffic, infrastructure and capacity. But it also changes the tone of the area hugely. Surely we must be able to continue to find solutions by using a collection of smaller, brownfield and fill-in sites, preferably around the city itself, before we ever start taking whole swathes of practically unspoilt land and converting it to towns. I support the need for housing when intelligently done.

Specifically re the Horsley sites, I am of the view that the sites 36,37,38,39,40,41 represent a reasonable addition to the village, being within the existing green belt and village boundaries.

However, I also don’t want to see the Green Belt boundaries outside these village boundaries changed. We should be totally keeping Green Belt land. We need to protect the village greenbelt boundaries to remain as tight as possible, and continue to find solutions from WITHIN villages, all villages, or at the edge of the towns, or in brownfield /in fill sites within Guildford itself. But please keep the villages small.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I am writing to object to the local plans for the Horsleys. The numbers of houses planned are excessive, and the changes to the green belt are not in the best interests of the village.

The Green Belt is critical to the Area's quality of life, and we urge you not to remove the current protection which for example the Horsleys enjoy. It opens up any chunks of land for possible house building including the land adjoining High Park Avenue. It is not just the Horsleys under threat – but also Ockham/Wisley, Ripley, Send, West Clandon and Effingham, on this side of the Borough.

Surely there are better brown field sites which could satisfy demand. The worst possible solution is to use or change the green belt.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/293  Respondent: 15128641 / Caroline Dixon  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT THE LACK OF IMMEDIATE PROVISION FOR NEW SCHOOLS

I OBJECT THE LACK OF ANY IMMEDIATE PROVISION FOR DOCTORS SURGERIES

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/292  Respondent: 15128641 / Caroline Dixon  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO ALL ERROSION OF THE GREEN BELT

I OBJECT ANY "IN - SETTING" OF ANY VILLAGES FROM THE GREEN BELT

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/291  Respondent: 15128641 / Caroline Dixon  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. I object to any proposed traveller sites in Ripley and the surrounding area.
2. I object to the fact there are no additional doctors surgeries planned.
3. I object as there are no more proposed schools.
4. I object to the lack of evidence for the number of extra housing needed.
5. I object to the huge disproportionate amount of housing supposedly needed.
6. I object to the need for an industrial estate to be built on green belt.
7. I object to the tearing down of ancient woodland.
8. I object to the lack of consultation before these proposals.
9. I object to the limited consultation period.
10. I object to the inclusion of last minute sites

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/112  Respondent: 15128833 / Maureen Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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2. I object to the fact there are no additional doctors surgeries planned.
3. I object as there are no more proposed schools.
4. I object to the lack of evidence for the number of extra housing needed.
5. I object to the huge disproportionate amount of housing supposedly needed.
6. I object to the need for an industrial estate to be built on green belt.
7. I object to the tearing down of ancient woodland.
8. I object to the lack of consultation before these proposals.
9. I object to the limited consultation period.
10. I object to the inclusion of last minute sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/113  Respondent: 15129057 / Yvonne Hamilton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to register my objections to the proposed development plans within the Parish of Send. I request that my comments and objections be seen by the Inspector.

Firstly I strongly object to the underhand way Guildford Borough Council have changed their original plans for development without a full consultation period. The Council have not followed the correct procedure introducing an increase from 185 houses during April 2016 to 485 in May 2016. This substantial increase would put yet more pressure on our local community, the roads, the doctors surgery, the schools.

I object to the proposed plan to build a new junction on the A3 which will have a negative effect on our local roads, it would further increase traffic in the area, and should there be any accidents on the A3, the result would be gridlock through the villages of Send, Ripley and Clandon. We already experience heavy traffic on the local roads, which has a significant impact on the local environment, safety for road users and pedestrians and further deteriorates the condition of our local roads.

I object to the proposed development at Garlick's Arch, this is Green Belt and is still protected. Send should not be removed from the green belt, we are in danger of losing the character of our village. We should be conserving our woodland and green areas not taring them down to build an additional 400 houses and an industrial development which are
not needed. The Employment Lands Needs Assessment 2015 showed a decline in the need for employment floor space. As I drive around Guildford and the surrounding towns and villages I see plenty of empty office space and industrial sites unoccupied, why doesn't Guildford Borough Council direct some energy into working out a way to productively use the empty spaces and sites we already have?

I object to the introduction of the plan for 40 houses and 2 travellers pitches to be built on the land west of Winds Ridge and Send Hill. Yet again this is Green Belt, and would be spoilt by the proposal.

In conclusion I would urge the council to reconsider their plans, we do not have the infrastructure to accommodate all this development and increase in local population, the pressure on our surgery, schools, environment and roads would impact on all our village residents. We are a village and do not wish to become a town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/114  Respondent: 15129121 / Richard Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the removal of 15 villages, including Ripley and Send, from the green belt. This will lead to wholesale, and often inappropriate developments.

I OBJECT to the fact that GBC have not followed the correct process for Send and Ripley developments. Any significant changes to the 2014 proposals, such as the proposal development of Garlicks Arch, should have required another full consultation, which did not happen. This invalidates the whole process.

I OBJECT to the fact that GBC have failed to provide sound evidence in terms of the Employment Land Needs Assessment which shows that industrial space at Burnt Common IS NO LONGER NEEDED.

I OBJECT to policy A43.30 the proposed development of Garlicks Arch designated for 400 houses and an industrial estate. This is a new site not included in the Regulation 18 draft and has NOT been consulted on previously. It is not only permanently protected green belt but also a site of ancient woodland with some trees planted in the 16th century.

I OBJECT to policy A44 which would see 40 homes and two travellers' pitches on land west of Winds Ridge and Send Hill. This was again a NEW site NOT included in 18 draft and therefore has NOT been consulted on previously. Once again this is Green Belt land partly containing unsafe landfill. Access is by a narrow lane which could never take the volume of traffic that would ensue from traveller's pitches.

I OBJECT to the fact that the Local Plan takes no account of schools, doctors surgeries and roads that are already operating at full capacity. Another 4000 houses in this area with a conservative estimate of a further 8000 cars would be catastrophic.

I do however strongly SUPPORT policy A43.30 - the development of new four way interchange onto the A3. A new interchange is much need already, to reduce traffic flow through the village of Ripley, including huge numbers of HGVs. I would also like to see a southbound entry to the A3 at the A3 junction at Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPS16/166</th>
<th>Respondent: 15129185 / Fraser Paterson</th>
<th>Agent:</th>
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I object to the proposed plans for the development of Garlick's Arch and to the proposal to remove Send from the Greenbelt.

I object to the development of Garlick's Arch on the basis that I understand these houses are in addition to the number of houses already proposed for the borough and that they are an unnecessary destruction of Greenbelt land. Also, should this development go ahead there is no infrastructure, Roads, Transport facilities, Medical facilities, Schools etc, to support the additional population these houses would bring. With regard to the Industrial Development there appears to be no justification whatsoever for this as I understand that this replaces the industrial development planned for Slyfield which is obviously a much better site for such development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPA16/117</th>
<th>Respondent: 15129281 / C Nicholson-Ross</th>
<th>Agent:</th>
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<tr>
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Having lived in Ripley for some 14 years I am appalled that Guildford Borough Council could contemplate taking Ripley and the surrounding villages out of the Green Belt.

I object strongly to ALL erosion of the Green Belt. Particularly the removal of villages from it’s protection.

There has not been a suitable length of Consultation time for these proposals, with some New Sites being included with less than two weeks notice.

We do not have the infrastructure to cope with these proposed developments. There are not enough Schools or Medical facilities to say nothing of the impact this will have on our roads. Ripley is suffering enormously already with traffic queues now, how does Guildford Borough Council and the Highways Agency think we will cope if all this proposed development goes ahead?

I further object to the suggestion that we need all this new housing – where is the direct evidence for these requirements. This plan also proposes a disproportionate amount of Development in the area.

Please register my comments and my outright objection to this Draft Local Plan.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp172/1965</th>
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<tr>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to your proposals for an increase in the already worryingly high number of homes to be built in Tannery Lane as this would cause unacceptable levels of traffic in this area. I also feel that the proposed development would have a detrimental effect on the Papercourt Nature Reserve which plays an important part in the conservation of birds, animals and plants.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to your plans to increase the development in the Garlick's Arch area particularly as you have shown nowhere in the plan why you feel this development is necessary. The area falls within Green Belt land and, as such, you need to show exceptional need before allowing development to happen. If your proposals are allowed to go ahead it will mean that Clandon, Ripley and Send simply merge together into one expanse of buildings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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I object to your loading this North East corner of your Borough with an unfair amount of development whilst removing planned development from other areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID:</th>
<th>PSLPA16/118</th>
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<th>15129345 / Vin Sundera</th>
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You have established a need over the entire Borough for eight plots or pitches for Travelling Showpeople to include storage facilities along with housing. Again, this not appropriate use of Green Belt land and furthermore why is 75% of this need included in your plans for Ripley? I object strongly to this unfair allocation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to all erosion of the Green Belt.

I object to your plans to destroy the Green Belt. Have we not learnt lessons? Many areas in the UK are susceptible to floods and we have to protect the very little land we have by planting more trees and not destroy them to build houses and roads.

I object to site A43 Garlic Arch.
I object to site A43a the on and off ramp at Clandon - this will increase traffic problems in the villages, not help them! More and more young people get through their driving tests and even where we live, some families have more than one car and they block entrances by parking their cars everywhere. Then over weekends and during holiday periods, we all have visitors and when everyone drives around, leave engines running, this place is no different to a car park nearer town centre. We are unable to open the windows, because of the exhaust fumes.

When, about twenty cars in our cul de sac can cause this much stress, what would it be like if you build more houses and roads everywhere in the areas you have planned to build destroying the precious and much needed Green Belt!!! Very sad. In the long run, this area will be crowded, people will be unhappy, and too much traffic, noise and pollution caused by this, will be a danger to the young children and to the elderly people like me.

I depend on the Send Help group to take me to my doctor or to the hospital. They are helping the elderly folks in this area. I'm very grateful for the organisers of this group, because they are providing a great service to the community. I thought I ought to mention this, because, we have no bus service to get to our medical centre in Send and I depend on them, just like many old people in this area where we live.

I hope you reconsider your plans to build houses. You will regret it when the area floods. Where can the water go? The Green Belt must have protected this area all these years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
supermarket some miles away (whilst not feeling well) and getting it from there. How are the local roads, local parking provision and doctors surgery supposed to cope with any amount of new houses?? The example above is not a one off. This is a regular thing, access to the shops on Wharf Road is chaos, so much so that we avoid shopping there. How can that be right?

It’s not just the obvious things like getting a doctor’s appointment. The council are great and provide recycling facilities, one such one being in the car park on Ash Hill Road. These facilities are often full to the brim – again I am not criticising the council but I am asking you how a development of “up to 115” houses expects a local community to continue to function when already under such pressure? Let’s not forget the local schools as well, it is not realistic to think they could accept more children.

Traffic – DON’T GET ME STARTED ON TRAFFIC. The local roads during rush hour (which is in fact rush morning and rush afternoon – it is not restricted to an hour) is hideous. The area comes to a standstill. Often the longest part of my commute is getting in and out of Ash (and I don’t need to get through the level crossing). Local roads simply can’t cope with any more traffic. I only travel 12 miles to work but due to local traffic I leave before 7am, far earlier than needed just to compensate.

If any development is to go ahead the local road infrastructure needs review and improvement beforehand, the traffic lights at the junction of the Guildford road and the Pirbright road on the A323 along with the level crossing on the A323 need addressing as these are both severe bottlenecks. Additionally cars currently park along Foreman Road causing a width restriction - this road and the surrounding village roads (e.g Grange road) are unlikely to be able to manage increased traffic, and any increase will severely impact the people who currently reside there.

In an ideal world people would use more public transport HOWEVER, when we used our local railway station (Ash) to travel we paid a fortune for seats, only for there to be standing room only and an uncomfortable, expensive, potentially dangerous journey. It’s hardly encouraging and not a suitable alternative if the services aren’t able to cope either. This is not speculation, this is a real example. We would need more train carriages added to services passing through Ash.

I am not aware of the flooding issues in the area but I am aware that when it rains the water pours off the Ash Ranges, down Brackendene (private road) and towards the area you are referring to. We can literally watch it washing the road away. If our village open space is built on where will the surface water go? With flooding on the increase in places it has not flooded before how will the area (the new development and beyond) be protected? This is a very real concern.

I will leave my comments there, it would have been easy to send you a list of bullet points with the usual traffic, doctors, schools etc. but I wanted to relate the information to real situations. We live here, we experience the actual frustrations on a daily basis. All I can see at the moment is that this proposed development would have a negative impact. Unfortunately we have looked at your website https://www.sites.google.com/site/foremanroadash/home but it lacks proper detail which would help us make more meaningful comments or see a better side. What detail is provided is frustrating E.G. you can’t zoom in on the maps, the key is totally unreadable. Statements like “up to 115” and “Each home will be provided with car parking” are far too vague. How many parking spaces would a property with 5 bedrooms have for example? I would assume no less than 3? If I was being cynical I would say that the website is there to “tick a box” rather than to provide any meaningful content or attract any helpful suggestions!

Please listen to the comments made and offer real, actual solutions to the real, actual problems that exist and will be made worse. Comments such as “There is the future ability to put in place a pedestrian crossing over the railway line, should the Council decide to deliver this facility.” are laughable. What does that actually mean in real terms? ..NOTHING.. This would need to happen.. and before the houses are built. Not years afterwards if at all..

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>I object to new sites (Garlicks Arch) being introduced as an after thought when it was not even considered in the previous plan. A slip road on the A3 at Burnt Common has been added to the Draft Local Plan without Highways England consent.</td>
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<td>I object to a totally unrealistic number of houses for the country lanes to absorb.</td>
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**Introduction:** The policy A44 refers to new development of green sites which are recovered land fill sites after the closure of Sand Quarries. A major part of this site is currently privately owned by a person who bought it to protect the area from overdevelopment in 2002.

The other part is owned by GBC and to date has been left as an open space for the enjoyment of the local community. At the northern end is another piece of land which is owned by a traveller family. There was some consternation some years ago when the travellers set up unauthorized pitches on the land which is covenanted against such use and development. The incomers were evicted with the authority of the council and a deep trench was created to prevent any further incursion. This land is locked in on all sides by public footpaths and there is no vehicular access. Provision of Traveller pitches would compromise the covenant and enable unauthorized development which would be difficult to challenge and expensive on the local purse to resolve.

The landfill system won an award and it is well vented and monitored for methane and other pollutants. It is said that before the landfill was capped off, a large quantity of asbestos was dumped on the top level.

The residential setting to the east of these lands provides high quality housing through 57 properties and there is also a cemetery which is in regular use. The road to the junction with Potters Lane is narrow and is often congested at peak hours with traffic to the school at the northern end of Send Hill. The Junction is dangerous as cars and other vehicles emerge into a short stretch of road that is between two blind bends and there are frequent accidents and near misses.

Traffic at peak times by the school is very congested and there is a high risk to the children who are being dropped or collected at either end of the school day.

**OBJECTIONS**

I OBJECT TO EVERY ASPECT OF THIS PROPOSAL.

In particular, I object to the proposal for the travellers' pitches. The local plans "ambition" is to improve the quality of existing residents and the introduction of a culturally different group to the area has the likelihood of imposing increased noise, nuisance and traffic which would be detrimental to existing residents. [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]

I object as this is a new proposal and the consultation that is required is a FULL CONSULTATION UNDER REGULATION 18 rather than Regulation 19.

I object as there is a risk to existing residents if the underground asbestos is disturbed while the infrastructure development takes place.

I object as the provision of infrastructure to support 40 homes and two traveller pitches will require a huge disruption to the detriment of existing residents and through traffic. The necessary land clearance and provision of water, sewage, energy and telecoms will create a level of traffic and noise in an area which is noted for its peaceful amenity and rural charm.
I object as the proposal threatens the rural amenity and property values are likely to fall with loss of revenue to the local council and the local economy (eg estate agents) as well as to the Exchequer in relation to stamp duty.

COMMENTS ON OTHER POLICIES IN THE LOCAL PLAN.

Policy P2

It is proposed that policy P2 would remove Send from the Green Belt to allow for the scale of development that GBC seeks.

I object in principle to this proposal which threatens to change the life of the village residents through over-development and pressure on local resources in health and education. This is an unjustified imposition on local people who will see no benefit to the wider community but certain prof its for the developers. There is already a pattern of through traffic congestion which will be predictably worsened year on year as there is a high local dependency on private cars for people to access their place of work in the local towns. The impact on traffic pollution levels need to be evaluated as there is strong evidence that such patterns of congestion at peak times when children are starting the school day creates such an impact on their health and development which must not be ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5934  Respondent: 15129441 / Janice Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5933  Respondent: 15129441 / Janice Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently outside their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Response to changes in the local plan affecting site A44 -

Land to the West of Winds Ridge.

I live opposite the proposed development site and have done so since 2003. This piece of green belt provides considerable amenity for those seeking refreshment, opportunities to exercise themselves and many dogs during the course of the day. Many runners and walkers, some very elderly currently use Send Hill as a quiet place to exercise during the day in spite of the lack of pedestrian facilities. Send Hill is a narrow country road beyond the cemetery and traffic already builds up in the school rush hours with heavy parking related congestion during those times, especially near the schools at the north end.

Whenever there are traffic flow problems northbound on the A3 people with local knowledge will use Potters Lane and Send Hill as a diversion to bypass the problem. Traffic volumes will increase considerably at those times.

The parish council also note that the users of the cemetery, both for multi-denominational funerals as well as regular visitors will be adversely affected by the inevitable increase in traffic and noise of passing vehicles.

The school bus and HGVs accessing Send Hill via Potters Lane are often seen to have difficulties in negotiating this narrow road especially in attempting to pass each other in opposite directions – which is often hard enough for two or more cars.

There is little scope for improving the infrastructure. There is no public transport available and the road to the village may prove to be unduly hazardous to pedestrian families with young children who may be tempted to buy affordable houses on low incomes while affording one or two family cars to add to the congestion. It is well over 1.5 miles to the shops, such as they are, and the GP health centre and pharmacy are as far again in the opposite direction along Send Barns Lane. There is a public footpath which connects to the recreation area but with cuts in council expenditure the maintenance is wanting and in poor weather the path becomes unsuitable.
The proposal to build 40 affordable houses at A44 suggest an intensity of development in a poorly resourced area which the Parish Council has deemed unsuitable for this level of development on several grounds including the failure of the proposing Council to supply evidence of need objectively. The council is bound to take a view on the impact on the environment as well as aspects of community welfare on a range of issues.

The land which is owned by the council at this point is a former landfill site and it is known that a range of asbestos products have been dumped towards the end of the site’s usage. It seems to me to be unnecessary to add to risk of contamination during any development work and the council has not addressed this issue as far as I know. Dealing with such a risk would increase costs and may render the whole project unaffordable!

Provision for two Traveller sites.

This proposal includes the facility to keep large fairground machinery and transport vehicles on the site with the implication that this will become a major feature of the new landscape. We see that other traveller sites are proposed in the local area and it would be interesting to know if the travelling community has been consulted about their preference to have sites close to each other rather than separated in this way.

In historical terms, there is a piece of land in excess of one acre at the north end of A44 which is owned by a Gypsy family who attempted to gain access across the land owned by the Council. They were evicted as the council did not approve of such use of the land. A large ditch was dug to prevent further intrusion and the wooded area left unused. It is understood that the current owner who lives in W. Sussex does not support this proposed use of land adjacent to hers.

Our view is that such a proposal would bring about such a fundamental change in the environment and bring an unwanted impact on the current settled community simply because of the nature of what is proposed.

In summary – we object to all the provisions proposed in the allocation for A44 and we support the position of the parish council who have determined that such an allocation is un-necessary and that the land identified is unsuitable for such an intensive development because of infrastructural deficiencies, lack of amenity to support such an explosion of population in a small part of the parish. It would also impact on the current usage which so many people enjoy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to make the following objections to your planning for Garlic Arch.

I OBJECT to the removal of 15 villages, including Ripley and Send, from the green belt. This will lead to wholesale, and often inappropriate developments.

I OBJECT to the fact that GBC have not followed the correct process for Send and Ripley developments. Any significant changes to the 2014 proposals, such as the proposal development of Garlicks Arch, should have required another full consultation, which did not happen. This invalidates the whole process.
I OBJECT to the fact that GBC have failed to provide sound evidence in terms of the Employment Land Needs Assessment which shows that industrial space at Burnt Common IS NO LONGER NEEDED.

I OBJECT to Policy A43.30 the proposed development of Garlicks Arch designated for 400 houses and an industrial estate. This is a new site not included in the Regulation 18 draft and has NOT been consulted on previously. It is not only permanently protected green belt but also a site of ancient woodland with some trees planted in the 16th century.

I OBJECT to policy A43.30 the development of new four way interchange onto the A3 which would mean that narrow Send Road (A247) would be the main route for traffic leaving the M25 and A3. It is already crowded and vulnerable to traffic jams. Further traffic from this development would result in permanent gridlock. It simply would not work.

I OBJECT to policy A44 which would see 40 homes and two travellers' pitches on land west of Winds Ridge and Send Hill. This was again a NEW site NOT included in 18 draft and therefore has NOT been consulted on previously. Once again this is Green Belt land partly containing unsafe landfill. Access is by a narrow lane which could never take the volume of traffic that would ensue from traveller's pitches.

I OBJECT to the fact that the Local Plan takes no account of schools, doctors surgeries and roads that are already operating at full capacity. Another 4000 houses in this area with a conservative estimate of a further 8000 cars would be catastrophic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objection to Last Minute Plans to Develop Garlick's Arch, Burnt Common, Send, Surrey.

I wish to object to the proposal to build on the area of land at Garlick's Arch, Burnt Common.

I am concerned that this will destroy the natural village-atmosphere we currently enjoy in Send and Ripley and believe that this is not the place to concrete over green belt land so necessary to provide a buffer between Woking and Guildford.

Once Guildford Borough Council begins concreting over Green Belt Land, it will destroy Surrey and its natural charm. I am a student who has lived in this borough all my life - I want it to retain its beauty for future generations not just become an overspill for Greater London sprawl.

Besides, I am advised that this proposal has not followed the correct process and a road junction has been added. This needs a full consultation to allow local residents to air their grievances, which will no doubt be considerable.

I believe that new housing should be confined to brownfield sites. Infrastructure in this area is already overloaded.

Am I correct in believing that 13,860 additional houses have already been proposed for this borough? We do not need any more and this site is new and has not been consulted on previously.

I expect Guildford Borough Council to behave in a responsible and indeed legal manner in matters of such importance and not just rush through proposals in the hope that residents will not notice. You can be assured that we will notice and object in the strongest way.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to Send being removed from the green belt as it provides a buffer between Woking and Guildford. Particularly vulnerable areas of land are being taken out of the green belt namely; 1. The land behind the school including playing fields and woodland; 2. The land to the right of Cartbridge by the river Wey navigation up to the new boundary fence with Vision Engineering and 3. Land to the left of Cartbridge going up to the old depot on the Wey navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/170  Respondent: 15130625 / Joan Alldis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the soundness of the evidence provided by GBC because the Employment Land Needs Assessment 2015 (ELNA) shows an 80% reduction in employment space from the previous ELNA carried out by GBC in 2013; meaning the industrial space at Burnt Common is no longer needed. Housing numbers derived from the Strategic Housing Market Assessment 2015 (SHMA) are highly questionable. The number of foreign students has been incorrectly used to inflate the numbers. The required 13,860 homes in the local plan is exaggerated. On the premise that the population grows by some 20,000 in the plan period, there will be a need for 8,000 homes (based upon an average of 2.50 persons per home). Therefore, the green belt does not need to be utilised for the building of homes. 50% of new homes could be built on brownfield sites. GBC’s Transport Assessment was not available to councillors for the vote taken on 24.05.16 as it was not published until 06.06.16. Infrastructure overload has received scant consideration and attention.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/162  Respondent: 15130625 / Joan Alldis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)
I object to the Proposed Submission Local Plan Strategy and Sites because GBC has changed every major site in Send proposed for development. The 2014 proposal for 430 houses was reduced in April 2016 to 185 and has just increased to 485. This is a significant change and consequently requires another full consultation under Regulation 18 as opposed to the 'short cut' under Regulation 19. By utilising Regulation 19 GBC is invalidating the entire process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/163  Respondent: 15130625 / Joan Alldis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I object to Policy A43.30 ha LAND AT GARLICKS ARCH, Burnt Common, designated for 400 houses and 7,000 square metres of industrial development including warehousing. There is no need for any additional houses given the 13,680 already proposed for the borough. This site is new and was not included in the Regulation 18 draft; neither has it been consulted upon previously. It is green belt permanently protected by the NPPF which prevents the merging of settlements. There are no exceptional circumstances. The site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The proposed industrial development of 7,000 square metres is not required since the latest Employment Land Needs Assessment 2015 (ELNA) indicates a reduction of 80% in required employment floor space when compared with the previous draft plan. If it is felt there is a need for 7,000 square metres of industrial space then it should be developed at Slyfield. A new 4-way interchange onto the A3 at Burnt Common to serve this development would be wholly disastrous for Send. Send road (A247) would be gridlocked all day. Send would become the thru route to Woking for traffic leaving the M25 and A3 following the proposed 2,000 houses at Wisley and the 2,000 houses at Burpham. Send cannot take it.

I object to Policy A44.1.9 ha LAND WEST OF WINDS RIDGE AND SEND HILL designated for 40 homes and 2 travellers pitches. This site is new and was not included in regulation 18 draft and has not been previously consulted on. Development for housing is inappropriate due to its permanent green belt status and high quality green belt amenity within an area of outstandingly beautiful countryside which would undoubtedly be spoiled by any development. The subsoil of the existing site contains documented unsafe landfill waste which is currently vented. The proposal to include 2 travellers pitches is inappropriate due to the narrow width single track country road providing inadequate and insufficient access to the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/303  Respondent: 15130817 / D Carter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to all the planning which I have listed below. I have lived in Ripley and Send and grow from the little villages with house and traffic and not for the better.

1) I object that GBC have not followed correct processes
2) I object that GBC have failed to provide sound evidence in terms of the Employment Land Needs Assessment 2015
3) I object policy P2. Send should not be removed from the Green Belt
4) I object to Policy A43, 30 ha of land at Garlick's Arch, Burnt Common, designated 400 houses and 7,000 sqm of industrial and warehousing
5) I object to Policy A44. 1.9 ha land west of winds ridge and Send Hill, designated for 40 homes and Travellers Pitches

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1970  Respondent: 15131425 / Roger Mutton  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wrote to the planning policy consultation on 11th June with objections which I will now re-enforce with more details now made available to me.

I object to the local plan on the grounds that Send is in the Greenbelt and because too many houses are proposed to Send and Send Marsh area it would impact on local services and create additional traffic congestion and consequent drop in air quality and quality of life. There is also evidence of flood risk.

Site A44 - I object to the proposal to build on the landfill site on Send Hill. I now find that Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005 identifies that the proposed site is a local authorised landfill site as licensed under Part II of the Environmental Protection Act 1990. It is not a quarry as specified in the GBC Local Plan.

I object to the proposal on the grounds that Envirosearch Report RS1100201_1_1_1 dated 1yih February 2004 and historical map data and information from GBC, has identified the site as landfill and has "areas of potentially contaminative industrial activities". The widely reported death of the unfortunate child caused by seepage from contaminated ground following flooding is a dire warning not to disturb the site.
I object to the proposal on the grounds that Send Hill is a single track country road quite unsuitable for further development with a cemetery and little space for vehicles to turn and pass each other.

Site A43 - I object to the Garlick Arch and A3 intersection proposals because the site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The site is also subject to flooding.

I object to building 45 houses at Clockbarn Nursery because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.

I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A2.47 which are all already at 100% capacity.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the proposal change in Tannery Lane on the grounds that firstly it erodes the Green Belt in our village along with some other plans for the area, but just as important the density of housing is too great for the village. So no additional housing should be contemplated anyway. The lane itself is narrow and the junction into the main village road inevitably will increase hold ups and delays, in turn will increase pollution from the resulting extra traffic, which in turn is putting too much pressure on the road through Send, already a main route to Woking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the Policy A42 proposal change in Tannery Lane on the grounds that firstly it erodes the Green Belt in our village along with some other plans for the area, but just as important the density of housing is too great for the village. So no additional housing should be contemplated anyway. The lane itself is narrow and the junction into the main village road inevitably will increase hold ups and delays, in turn will increase pollution from the resulting extra traffic, which in turn is putting too much pressure on the road through Send, already a main route to Woking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Dear Sir or Madam,

I object to the Policy A42 proposal change in Tannery Lane on the grounds that firstly it erodes the Green Belt in our village along with some other plans for the area, but just as important the density of housing is too great for the village. So no additional housing should be contemplated anyway. The lane itself is narrow and the junction into the main village road inevitably will increase hold ups and delays, in turn will increase pollution from the resulting extra traffic, which in turn is putting too much pressure on the road through Send, already a main route to Woking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/1064  Respondent: 15131425 / Roger Mutton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to Policy A43, the change at Garlick's Arch. It ignores all the previous objections, there is no proven demand for travelling showmen's plots in the location.

It is in an area of outstanding historical beauty being in ancient woodlands some 600 year old.

I object most strongly too to the fact it will link Ripley and Send and destroy the green belt between the villages.

Another example of lack of consideration for the openness of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/1066  Respondent: 15131425 / Roger Mutton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy A43, the change at Garlick's Arch. It ignores all the previous objections, there is no proven demand for travelling showmen's plots in the location. It is in an area of outstanding historical beauty being in ancient woodlands some 600 year old. I object most strongly too to the fact it will link Ripley and Send and destroy the green belt between the villages. Another example of lack of consideration for the openness of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1065  Respondent: 15131425 / Roger Mutton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A58 at Burnt Common because it was deleted from the 2014 draft, also the wording change minimum from the earlier draft of maximum. The 2017 Employment Land needs shows the requirement is dropping in terms of land required. The proposed 10 hectares is vastly more than the 3.9 which is proposed for the whole Borough, this cannot be allowed to go through. Additionally it adds to the increase of vehicular traffic in the surrounding roads and is another added pollution burden which the area should not be asked to bear.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1068  Respondent: 15131425 / Roger Mutton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
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I object to Policy 2 at paragraph 4.3.15 I object to the Send Business Park being removed from the Green Belt, yet another unnecessary diminution of the very precious green land in our village. It again will increase pressure on the junction of Tannery Lane and the main road through the village. A narrow lane with added traffic, what a poor way to treat the environment, adding extra business traffic to the area which is an old non-conforming user in an area of outstanding natural beauty.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to the Policy A42 proposal change in Tannery Lane on the grounds that firstly it erodes the Green Belt in our village along with some other plans for the area, but just as important the density of housing is too great for the village. So no additional housing should be contemplated anyway. The lane itself is narrow and the junction into the main village road inevitably will increase hold ups and delays, in turn will increase pollution from the resulting extra traffic, which in turn is putting too much pressure on the road through Send, already a main route to Woking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPS16/172  | Respondent: 15131681 / Norman Lavender | Agent: |
I object to the fact that Guildford Borough Council has not provided evidence in terms of the Employment Land Needs Assessment 2015. Also the infrastructure in the village of Send just does not exist to support any of this proposed development.

I object to Send being removed from the green belt. I accept the need for new housing but there is no reason these should be built on green belt land when there are so many brownfield sites available.

I object to the fact that the "final draft" of the Local Plan which has been prepared without the requisite full consultation under Regulation 18. This has changed vastly from the one originally proposed (and objected to) in 2014, increasing the number of proposed houses from 430 to 485, and adding a new road junction which was not mentioned in the earlier Plan.

I object to the proposed new homes on the land west of Winds Ridge and Send Hill. Again, this was not included previously. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented.

I object to the proposal for 400 houses and 7000 sqm of industrial and warehousing at Garlick's Arch, and a new interchange onto the A3 at Burnt Common. This would cause major problems due to the increase in the amount of traffic coming through the village of Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to how there seems to be inappropriate handling in the application process where significant changes have occurred. I OBJECT to the changes in volume of houses without it going to full consultation. Starting at 430, reduced to 185 and increased to 485.

I OBJECT to the change of how land is being used changing from 40 houses to 2 traveller sites not included in the regulation 18 draft and hence NOT consulted on and has insufficient accessibility to site.

I Object to this proposed plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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The traffic problem in Guildford is huge. The slightest problem on the A3 or any other approach road means the whole town can and does come to a standstill. This is not just about people sitting in their cars going nowhere, it's about the health and wellbeing of those of us, and our children, who already live, work and go to school on the congested roads, breathing the fumes and particulates that are generated by the ever increasing traffic.

It is about our lives. This town cannot take another 20,000 or more cars trying to get into and out of it.

Please stop this nonsense now.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to the latest version of the local plan.

Guildford Borough Council intend to build 13860 houses with four developments exceeding 1000 houses. 70 percent of these on Green Belt land.

This proposal is massively out of proportion for Guildford and a much larger plan than any other borough in Surrey.

No constraints apply to this plan (as allowed by the National Planning Policy Framework) to take into account protected wild areas, Green Belt, flood risk or significant infrastructure constraints, all of which apply to Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/310</th>
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The traffic problem in Guildford is huge. The slightest problem on the A3 or any other approach road means the whole town can and does come to a standstill. This is not just about people sitting in their cars going nowhere, it's about the health and wellbeing of those of us, and our children, who already live, work and go to school on the congested roads, breathing the fumes and particulates that are generated by the ever increasing traffic.

It is about our lives. This town cannot take another 20,000 or more cars trying to get into and out of it and the infrastructure can not cope.

Please stop this nonsense now.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Our sewers are already failing to cope with the amount of effluent flushed into them and regularly flood our road when we get heavy rain. The treatment plant at Slyfield is still years away from being replaced.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/308  Respondent: 15131841 / David Wackett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford Borough Council intend to build 13860 houses with four developments exceeding 1000 houses. 70 percent of these on Green Belt land.

This proposal is massively out of proportion for Guildford and a much larger plan than any other borough in Surrey.

No constraints apply to this plan (as allowed by the National Planning Policy Framework) to take into account protected wild areas, Green Belt, flood risk or significant infrastructure constraints, all of which apply to Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/918  Respondent: 15131937 / Felicity Howell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to Send Village being removed from the Green Belt. Green Belt was meant to be permanent and there are no overriding circumstances to justify this change. Local Councillors and central Government gave a very clear election promise to protect our Green Belt. Send's Green Belt gives a buffer between Guildford and Woking becoming one large conurbation.

1. I OBJECT to building 400 houses and 7000 square metres of industrial space at Garlick's Arch (opposite Send Marsh Road). This site floods and is covered by ancient woodland. If industrial space is required, it should be located where similar activity currently exists, i.e. Slyfield - NOT ON A GREEN BELT SITE.
1. **I OBJECT to a new interchange with the A3 at Burnt Common.** Send would become gridlocked (although it's nearly that now!) because traffic from the proposed Wisley site of 2000 new houses, 2000 new houses at Gosden Hill, Burpham and 1850 at Blackwell Farm would come through Send! Pollution levels would rocket and be totally unacceptable.

1. **I OBJECT to the development of 40 houses and 2 travellers' pitches at Send Hill.** A very inappropriate site with narrow, single access country road. This site also contains unsafe landfill waste (which is documented and registered at GBC).

1. **I OBJECT to 40 more houses being built at Clockbarn Nursery.** Access to this site is totally inadequate and could not take any more traffic. Tannery Lane is a very narrow and winding road to be able to accommodate more traffic. Planning permission has been given for 64 new apartments at the Tannery and for building a new Marina - both making more traffic.

**WITH ALL OF THE ABOVE, THERE ARE THE PROBLEMS OF LACK OF INFRASTRUCTURE - MORE HOUSES, MORE INDUSTRIAL BUILDINGS, MORE LORRIES, MORE TRAFFIC CONGESTION, MORE PRESSURE ON DOCTORS SURGERIES, MORE PRESSURE ON SCHOOL PLACES, AND MORE POLLUTION.**

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write this email in an enraged mood to illustrate my strong objection to your underhand and cynical development plans on the whole but principally regarding those at Garlicks Arch and Wisley Airfield. My objections relate to numerous areas:

Firstly, the GBC have not followed the correct procedures, as it is my understanding that a further consultation was required for the new development plan to go forward, which has not occurred.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/174</th>
<th>Respondent: 15132129 / Carolyn Harrington</th>
<th>Agent:</th>
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<td>I would like to register my objection to the above plan. Development for housing is inappropriate due to its permanent Green Belt status. The sub soil of the site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is inappropriate due to the narrow width single track country road providing insufficient access to the site.</td>
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<td>I therefore object to this proposal. Please ensure my comments are seen by the inspector.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
I object to the proposed developments in The Guildford local plan 2016. I object to green belt land been taken to be used for housing and industrial use. Particularly at Garlicks Arch where there is ancient woodland at risk. I object to the huge impact that the Guildford local plan 2016 would have on the environment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/350  Respondent: 15132769 / Nicky Andrews  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposed development will increase additional traffic onto the local roads, which are already busy and suffer from much congestion. I object to further development that will increase traffic in and around our villages. With more traffic, air pollution will increase. I object to further development which will result in poorer air quality, which in turn can effect the environment and local residents health. Many of the strategic sites, eg Wisley Airfield and Garlicks Arch, do not have local railways within easy walking distance, nor do they have a good bus service. Leaving residents with little option but to get in their cars, resulting in yet more traffic, congestion and drop in air quality. I object that these sites are not sustainable.

I object to the proposed development and the pressure it will put on local infrastructure. It is already very difficult already to get a doctors appointment, and local schools are oversubscribed. How will local doctors and schools cope?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9689  Respondent: 15132769 / Nicky Andrews  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed development and the pressure it will put on local infrastructure. It is already very difficult already to get a doctors appointment, and local schools are oversubscribed. How will local doctors and schools cope?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/349  Respondent: 15132769 / Nicky Andrews  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed developments in The Guildford local plan 2016. I object to green belt land been taken to be used for housing and industrial use. Particularly at Garlicks Arch where there is ancient woodland at risk. I object to the huge impact that the Guildford local plan 2016 would have on the environment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9688  Respondent: 15132769 / Nicky Andrews  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposed development will increase additional traffic onto the local roads, which are already busy and suffer from much congestion. I object to further development that will increase traffic in and around our villages. With more traffic, air pollution will increase. I object to further development which will result in poorer air quality, which in turn can effect the environment and local residents health. Many of the strategic sites, eg Wisley Airfield and Garlicks Arch, do not have local railways within easy walking distance, nor do they have a good bus service. Leaving residents with little option but to get in their cars, resulting in yet more traffic, congestion and drop in air quality. I object that these sites are not sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1740  Respondent: 15133377 / Joyce Vincente  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPA16/127  **Respondent:** 15133377 / Joyce Vincente  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

As a resident of East Horsley I write to express my concerns and to register my objection to the proposed submission Local Plan.

**General Points**

The number of houses planned has risen to 693 houses per year over the next 20 years (compared with 652 per year in the 2014 Draft) and is more than double the 322 houses per year that was approved in the 2003 Local Plan

65% of new houses in the Borough are to be built on land that is currently in the Green Belt.

Section 150 of the Housing and Planning Act 2016 states that a site, once identified in a Local Plan, is assumed to have permission to go ahead in principle, which means normal planning restrictions may be difficult to impose later

Little notice has been taken of the comments received after the last round of consultation.

Of particular concern to me and my family is that a more local level the proposals include:

- At least 148 more houses in East Horsley.
- At least 385 more houses in West Horsley.
- Both villages to be taken out of the Green Belt. The new boundary, (called the in-setting boundary) extends the old settlement boundary and includes some fields and open spaces. This means that if they aren’t already identified in the plan for development that they too, are vulnerable to future development. Eg Kingston Meadows (by East Horsley Village Hall) is included inside the insetting boundary – despite being a valuable green space. Why?
- Similarly Horsley Tennis & cricket club at the end of Pennymead Drive is also inside the insetting boundary. Why?
- 2,068 houses on the former Wisley Airfield (2.1 miles away).
- 400 houses at Burnt Common (3.2 miles away).
- 2,000 houses at Gosden Hill Farm (4.2 miles away).

This amount of development would have a huge negative impact on the local community and amenities – see next section.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3401  Respondent: 15133377 / Joyce Vincente  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3402  Respondent: 15133377 / Joyce Vincente  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars. b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads. c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements. d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them). e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest. f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.
I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Specific Issues

Traffic and parking: Assuming that every new house has at least 2 cars, this means potentially 6,000 more cars within a three mile radius of the villages. The impact on local roads will be tremendous. Parking at Horsley & Effingham junction stations (which are already full), at the shops, at the medical centre and at the village hall will all be affected.

Local Road Network: In respect of the proposals for development at Wisley Airfield and for an upgrade the current A3 junction at Burntcommon to a full 4-way junction, SCC traffic modelling anticipates increased use of Guileshall Lane, Hungry Hill Lane and Tithebarns Lane for traffic accessing the A3 at Burntcommon in order to travel to Guildford and beyond. The SCC report states that “consequently, it indicates that further thought may have to be given to managing traffic in this area as part of a transport assessment should the development be progressed”. It appears that the Plan is proposing a strategic site at Wisley Airfield without even knowing what improvements to the local road infrastructure will be required. If that is the case for Wisley Airfield, then it is almost inevitably true for the proposed developments in East and West Horsley as well.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/354  Respondent: 15133377 / Joyce Vincente  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Schools: Local schools are already at capacity – where will newcomers go to school? No extra places are planned in the Horsleys, and the school places proposed at Wisley Airfield will not planned until many years into the project.

Medical facilities: Similar situation to the schools.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/355  Respondent: 15133377 / Joyce Vincente  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Loss of Green Belt land: Sadiq Khan, new Mayor of London, has instructed London planners not to approve development on Green Belt Land within the M25. If we continue to build on our countryside it won’t be many decades before we have none left. Creeping development has led to almost continuous housing from Central London to Effingham. Is this to carry on to Guildford and beyond? (1,700 houses are planned for the Guildford.

Conclusions

When my family and I moved to the area we did so because of the village lifestyle, and proximity to the green belt and rural environment.

The local amenities cannot cope with such a large planned expansion and it would completely alter the place that we chose to make our home.

At the heart of the problem is GBC’s desire to pursue a ‘Forced Growth’ policy which results in highly aggressive and unjustified targets being set for housing development in the Borough. These excessive targets – the proposed 25% increase in housing stock in particular – create a tremendous strain on both land and infrastructure in an already over-crowded and over-stretched part of the country.

These targets will also have a material adverse impact on the Metropolitan Green Belt across this area, despite all the political promises made to the contrary.

Accordingly this local resident OBJECTS to the Proposed Submission Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Flooding:** The site behind Ockham Road North in East Horsley is partially a level 3 flood risk area, and local residents are well aware of how much standing water there is in their gardens after rain. Building on such land will only exacerbate the problem. We already know what happens to local roads when it rains – the drains can’t cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

**Pollution:** The large increase in volume of traffic will cause an increase in nitrogen dioxide and particulates in the environment – already a cause for concern in several areas in the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please do sent me conformation that all of these comments together with all my previous are passed to the Inspector.

I reserve my right to appear at the inquiry and present my evidence.

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1) It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.

2) It is further from railway stations than any other identified strategic site.

3) It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)

4) Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)

5) Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.

6) Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.

7) It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.

   o The associated traffic increase from the RHS has not been taken into account.

   o The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account 8)There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.

9) The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station 10). It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
11) The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design.”

12) Opportunity (3) should be common to all sites and is not unique to this site. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.

14) I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

15) I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16). I object to the removal of additional 3.1 ha from the green belt without any justification. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

20) I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

21) I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

22) I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

23) I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

24) I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

25) I object to the extension of the plan period by 1 year as it has not been identified as a major change.

26) I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

27) I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

28) I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

29) I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

30) I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

31) I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

32) I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

33) I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.
34) I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

35) I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development. I particularly object to the reliance on the Carter Jonas study update 2017 which includes “demand” for retail space from companies already in administration.

For the reasons listed above and numerous other reasons, I consider that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/361  Respondent: 15134081 / Clive Searle  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I most strongly object to Send being removed from the Green Belt.

I most strongly object to over 400 houses being built as per policy A43. There has been little consideration given to infrastructure to support this inappropriate development.

Policy A44 (1.9 ha of land for 40 homes and travellers pitches). This I most strongly object to! Send village is a green buffer between Woking and Ripley/Guildford to continually keep building using the Green Belt is totally unacceptable and I object most strongly to this sort of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/129  Respondent: 15134145 / Chantal Crane  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
RE: Local Plan for Send

I refer to your proposal to build approximately 485 new houses in two new sites in the Send area.

I wish to strongly object on the grounds that the scale of the proposal is wholly inappropriate, with infrastructure being unable to handle the impact these would have.

I feel your tactics in repeating the process are outrageous and totally unacceptable.

I also strongly object to taking Send out of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I refer to your proposal to build approximately 485 new houses in two new sites in the Send area.

I wish to strongly object on the grounds that the scale of the proposal is wholly inappropriate, with infrastructure being unable to handle the impact these would have.

I feel your tactics in repeating the process are outrageous and totally unacceptable.

I also strongly object to taking Send out of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>SQLP16/172</th>
<th>Respondent:</th>
<th>15135873 / Julie Andrews</th>
<th>Agent:</th>
</tr>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): (No)</td>
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</tbody>
</table>
I object because infrastructure overload has not been taken into account in detail.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/173  Respondent: 15135873 / Julie Andrews  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I object and do not consider this legally compliant because the proposed changes require a full consultation under regulation 18 and not the short cut 19.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/174  Respondent: 15135873 / Julie Andrews  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I object because the land to the west of Wind Ridge and Send Hill has not been consulted previously and has just been added in.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/175  Respondent: 15135873 / Julie Andrews  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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<th>Comment ID: PSLPA16/2034</th>
<th>Respondent: 15135937 / Charles Crane</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I object because this has not followed process of soundness and compliance and should therefore not be considered until properly consulted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<thead>
<tr>
<th>Comment ID: PSLPP16/364</th>
<th>Respondent: 15135937 / Charles Crane</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I refer to your proposal to build approximately 485 new houses in the Send area.

I wish to strongly object to this proposal.

I feel that the local services, such as education, council and health services will be put under undue pressure and will suffer, meaning local residents will also suffer.

The previous proposal was rejected before because the local environment could not cope with the pressure that would be put on it. Nothing has changed... We should not made to go through the process again -the decision should remain 'NO'.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I feel that the local services, such as education, council and health services will be put under undue pressure and will suffer, meaning local residents will also suffer.

The previous proposal was rejected before because the local environment could not cope with the pressure that would be put on it. Nothing has changed .... We should not made to go through the process again -the decision should remain 'NO'.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/131  Respondent: 15136097 / Peter Fava  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The local plan proposals for Send are misleading. The planners propose to take the whole of the existing settlement area of the village, plus an additional 123 acres, out of green belt thereby removing the original presumption against development over this land. This redrawing of the current Send Green Belt boundary (The Green Belt inset) will allow additional development in the village far beyond the 485 houses mentioned in your recent information pack. Conservatively this could more than double to 1,000 houses which will mostly be four bedroom unaffordable homes. We need more affordable houses within Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/368  Respondent: 15136097 / Peter Fava  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I note that despite receiving 20,000 objections to your local plan in 2014 you managed to put an upbeat video on your website supporting your local Plan. It also expressly states the need for affordable housing. Why then do you only allow the building of expensive three/four bedroom houses in the area? A development of affordable houses, backed by a Housing Association in Send, would amply qualify for your support according to your video. To conclude, we need more affordable housing and not expensive big houses which only benefit the local developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I write to confirm my total opposition to your local plan for the area surrounding Send, Send Marsh and Burnt Common. The proposed increase in population of approximately 25%, without any significant improvements in the local infrastructure, is totally unacceptable. It is over 30 years since any reasonable improvements were made to the local roads, schools or the hospital. Our one and only surgery is now at maximum capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/366  Respondent: 15136097 / Peter Fava  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposed building at Wisley Airfield and Gosden Hill Farm will also add enormously to the flow of traffic through this area, an area that already experiences near grid-lock each rush hour. The A3 between Guildford and Burnt Common must suffer from the greatest number of fatalities of any road in Surrey. The new access/exit to the A3 at Burnt Common will increase capacity onto minor country roads doing little to improve the flow of traffic. The additional junctions will also make the A3 even more dangerous on this terrible stretch of road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/367  Respondent: 15136097 / Peter Fava  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Under the National Planning Policy Framework 2012 the Government stated that “The Government attaches great importance to Green Belt. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.”

Over the last 50 years we have seen the removal of village status from St. Johns, Knaphill, Maybury and others, turning Woking into one massive urban sprawl. We do not want the same thing to happen to Guildford; a beautiful town where one can see countryside from the very heart of the shopping centre. GBC must spend more time reassessing the brownfield sites within the existing area. In addition, your misguided assessment of the need for more shopping and office space in the Town Centre reduces the space available for housing. If there were more homes within the Centre, the area would become more vibrant and a big boost for the local economy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/372  Respondent: 15136417 / Bradley Rowe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please note that I object to building on the GREENBELT.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/132  Respondent: 15136449 / Mark Pat  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I'm disappointed to hear of the changes Guildford Boroughs intends to implement to the area which will adversely affect the area.

My wife, kids and I recently bought a house and moved to the area because of it's quiet, small village and beautifully untouched country surrounds. With the new proposal the existing character will be lost among other things.

- The existing services and amenities will not be able to sustain such an increase in residents.
- The existing schools are already oversubscribed, this would strain them even further and at the risk of lower their standards/rating.
- The local GP is already oversubscribed, with appointment waiting times from 1-3 weeks, they will not be able to cope.
- The train service will become more congested and inevitably more expensive.
- There is already not enough car park space at Horsley train station.
- The existing roads are already in disrepair with very poor maintenance and will only get worse.
- The village will not be able to cope with the additional traffic and parking space requirements.

I cannot think of any reason why it would be good for us and any of the other residents of the area to bring this change into effect and allow further development.

For the record I contest the changes and this NEW Local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

i. I object to the lack of evidence for the alleged number of houses needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/180  Respondent: 15136481 / Roy Padgett  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

b. I object to the proposals relating to site A43 at Garlicks Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/181  Respondent: 15136481 / Roy Padgett  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

c. I object to the proposed on and off ramp at Clandon (site A43a) which will add to the traffic problems in the surrounding villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/182  Respondent: 15136481 / Roy Padgett  Agent:
<table>
<thead>
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<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45</th>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>1. I object to The Talbot (site A45) which is an overdevelopment in a conservation area.</td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>Attached documents:</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>e. I object to site A57 The Paddocks which is unlawful.</td>
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<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</strong></td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>I object to the 2016 draft local plan on the following grounds.</td>
</tr>
<tr>
<td>1. I object to the erosion of the green belt which once lost can never be replaced.</td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>Attached documents:</td>
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</tbody>
</table>
f. I object to the disproportionate amount of development proposed for this area of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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g. I object to the limited consultation period.

h. I object to the addition of new sites with less than 2 weeks notice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/315  Respondent: 15136513 / Ian Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the lack of any evidence for the alleged housing need numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPA16/312</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the allocation of land to the strategic sites of Wisley Airfield, Garlicks Arch on Ripley / Send border and Gosden Hill Farm as development of these sites would have a disproportionate impact on the surrounding villages

2. I object to the A3 road from the M25 to Guildford becoming so congested that it will become a serious health hazard as a result of exhaust fumes from stationary or very slow moving vehicles

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/912</th>
<th>Respondent: 15136513 / Ian Mitchell</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the lack of immediate provision for new schools

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<td>1. I object to the lack of any immediate provision for Doctors Surgeries</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>1. I object to all erosion of the Green Belt</td>
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<td>2. I object to any “in setting” (i.e. removal) of any villages from the Green Belt</td>
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<tr>
<td>1. I object to the disproportionate amount of development in one area of the borough</td>
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<td>2. I object to the limited consultation period</td>
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<tr>
<td>3. I object to the last minute inclusion of new sites with less than two weeks notice</td>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I object strongly to the Draft Local Plan for the following reasons: 1. I object to all erosion of the Green Belt. 2. I object to any “in setting” (i.e. removal) of any villages from the Green Belt. 3. I object to the disproportionate amount of development in one area of the borough. 4. I object to the limited consultation period. 5. I object to the last minute inclusion of new sites with less than two weeks notice. 6. I object to the lack of any evidence for the alleged housing need numbers. 7. I object to the lack of immediate provision for new schools. 8. I object to the lack of any immediate provision for Doctors Surgeries. 9. I object to the allocation of land to the strategic sites of Wisley Airfield, Garlicks Arch on Ripley / Send border and Gosden Hill Farm as development of these sites would have a disproportionate impact on the surrounding villages. 10. I object to the A3 road from the M25 to Guildford becoming so congested that it will become a serious health hazard as a result of exhaust fumes from stationary or very slow moving vehicles. Please acknowledge safe receipt of this email.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp172/1014  Respondent: 15136513 / Ian Mitchell  Agent:</th>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I object to removal of Brownfield site (A34) from the Plan.

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp172/1013  Respondent: 15136513 / Ian Mitchell  Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A4</td>
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<tr>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</tbody>
</table>
I object to removal of Brownfield sites (A4) from the Plan

Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail, thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1016  Respondent: 15136513 / Ian Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the increase in housing proposed in Tannery Lane (site A42)

This has been increased by a third since the 2016 version of the Plan. This will have a devastating impact on the already highly congested local rural road network around Send and Ripley. This is in contradiction to section 2.14a of the Plan which states "Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays." And yet there are no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1007  Respondent: 15136513 / Ian Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2017) and in particular to the changes that affect Ripley and Send, which appear to make the Plan even worse than those proposed in 2016..

Please record my objections as follows:

1. I object to the extended development in the Green Belt (Policy P2, Site A43)
I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>pslp172/1008</th>
<th>Respondent:</th>
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I object to the allocation of 6 Travelling Show-people sites in A34 Garlick’s Arch

The allocation of 6 Travelling Show-people plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Show-people plots in A43 Garlick’s Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 as stated in section 4.2.24 of the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to the extended development in the Green Belt (Policy P2, Site A43)

I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A46</td>
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I object to the unfair imbalance of the Plan across the borough.

With the removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan has become even more biased against the North East of the borough. Guildford Borough is over 100 square miles. Of the 11350 homes proposed in the Plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1009  Respondent: 15136513 / Ian Mitchell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A50

The Plan is self-inconsistent in respect of traveller sites.
A50 Whittles Drive, Normandy, shows on the Site details: “Allocation: The site is allocated for approximately 14 Travelling Showpeople plots ...” Clearly A50 more than covers the total "need" of 8, (page 40, 4.2.22.) and so no “need” exists for this in site A43. This and other inconsistencies in the Plan mean no decision can be made on the basis of this document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1012  Respondent: 15136513 / Ian Mitchell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58
The inclusion of site A58 Burt Common, removes the need for A43 Garlick’s Arch

GBC’s own reasons for including Garlick’s Arch A43 in the 2016 version were

1. The site [A43] location affords greater separation between Send Marsh / Burnt Common and the proposed site allocation at Gosden Hill Farm, … (site allocation A25) than the Burnt Common site did”
2. The site [A43] provides the employment floorspace needed in the plan to help meet identified needs”

Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (which are almost contiguous) are in the plan; therefore, GBC are not following their own guidelines and objectives. Since A58 Burnt Common is now in the Plan (2017) more than the “required” industrial space is available there, so there is no reason for Garlick’s Arch to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1015  Respondent: 15136513 / Ian Mitchell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal for a Waste Management Facility in Green Belt (A58)

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/116  Respondent: 15136513 / Ian Mitchell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the hiding of development by “deferment” (A24, A25, A26, A43)

This version of the Plan has concealed some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects:
i) to hide the number of houses actually being built (A24, A25, A26 – total of 1100 deferred, but still being built!), and
ii) gives an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/117  Respondent: 15136513 / Ian Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit is to be an acceptable reason not to deliver affordable homes. This is a disgraceful sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/118  Respondent: 15136513 / Ian Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object removing Send Business Park from the Green Belt (4.3.15).

Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it's insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2263  Respondent: 15136641 / Jason Dack  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2182  Respondent: 15136641 / Jason Dack  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently outside their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighborhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/313  Respondent: 15136641 / Jason Dack  Agent:
As a Ripley resident, I am writing to express my objection to the development proposals outlined in the Draft Local Plan. Below are the objections I wish to make:

1. **Destruction of the Green Belt**
   I object to the proposals to remove (or “inset”) Ripley, Send and Clandon from the Green Belt. It is vital to preserve areas of outstanding natural beauty. Further developments will erode this and destroy the countryside.

2. **Overdevelopment**
   I object to the further housing and industrial developments in and around Ripley. There are a number of reasons for this - impact on local public services and infrastructure (see number 3), congestion (see number 4) and air quality (see number 5).

3. **Overburdened infrastructure including added strain on local healthcare, education and police services**
   I object to the lack of planning regarding infrastructure. For example, Garlicks Arch (Ripley/Send border). Without improvements to the infrastructure prior to any development, the quality of life for current residents will deteriorate significantly and in many ways. Existing doctor’s surgeries and schools are already stretched or at capacity. Services such as the Villages Medical Centre in Send will have their services overwhelmed. Many public services (for example, the police) are suffering from funding cuts or freezes. I object to the proposals due to the further burden it will put upon existing services.

4. **Congestion on the motorways, roads and lanes**
   I object to the development of the strategic sites due to A3 and M25 already being at capacity during peak hours. The developments will worsen the situation on the motorways, roads and lanes. Furthermore, Highways England has no plans to look at improving the A3 for a number of years. My village (Ripley) is already suffering from severe congestion for much of the day. As well as being highly congested, there are numerous incidents of road rage. Many of the country lanes around the villages of Ripley, Send and Clandon are very narrow and wide enough for only one vehicle at a time. Road surfaces in general are in a poor condition and heavy traffic will make them worse. I object to further development as it will mean more traffic, more congestion, more frustration, more noise and more pollution.

5. **Poor air quality**
   I object to detrimental effect these developments will have on air quality. Further heavy traffic, particularly in built up residential areas, will only lead to greater levels of air pollution.

6. **Parking**
   I object to the new developments because parking is already a huge problem in Ripley. My partner and I do not even have a parking space. I can only imagine how much worse the situation will get with a larger population.

7. **Disproportionate size of sites**
   I object to the allocation of land to the strategic sites of Wisley Airfield, Garlicks Arch (Ripley/Send border) and Gosden Hill (Clandon). The proposed development of these sites will have a disproportionate impact on the surrounding local villages. They will have a permanent detrimental impact on each of these communities.

8. **Unbalanced allocation of development in one area of the Borough**
   Between the M25 and Burpham (a distance of only approx 5 miles) it is proposed that over 6,500 houses are built. This represents over 40% of the housing proposed in the Local Plan. I object to this area being hit so hard by the allocation of development, which is disproportionate to the rest of the Borough.
9. Capacity of utilities
I object to the undoubted added burden on many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. I object to the development of Garlick’s Arch on the ground that there is little capacity in these networks.

10. Sites being planned in unsustainable locations
I object to the location of these developments because many of the strategic sites e.g. Wisley Airfield and Garlick’s Arch, are in unsustainable locations. They do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. I object on the grounds that these sites are not sustainable.

11. Lack of proper pedestrian footpaths on local roads
I object to these developments as footpaths in Ripley are already narrow and in some places non-existent. A further substantial increase in the local population will make navigating these footpaths more hazardous.

12. Heritage
I object to the effect these developments will have on the area’s heritage. There are a number of heritage sites in the region and no account is being taken on the impact of these points of historic interest.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4342  Respondent: 15136641 / Jason Dack  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to new sites (Garlicks Arch) being introduced as an afterthought when it was not even considered in the previous plan. A slip road on the A3 at Burnt Common has been added to the Draft Local Plan without Highways England consent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9174  Respondent: 15136641 / Jason Dack  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to 2016 Draft Local Guildford Plan

I object to a totally unrealistic number of houses for the country lanes to absorb.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9554  Respondent: 15136641 / Jason Dack  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9404  Respondent: 15136641 / Jason Dack  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/382  Respondent: 15136641 / Jason Dack  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition
As a Ripley resident, I am writing to express my objection to the development proposals outlined in the Draft Local Plan. Below are the objections I wish to make: 1. Destruction of the Green Belt I object to the proposals to remove (or “inset”) Ripley, Send and Clandon from the Green Belt. It is vital to preserve areas of outstanding natural beauty. Further developments will erode this and destroy the countryside. 2. Overdevelopment I object to the further housing and industrial developments in and around Ripley. There are a number of reasons for this - impact on local public services and infrastructure (see number 3), congestion (see number 4) and air quality (see number 5). 3. Overburdened infrastructure including added strain on local healthcare, education and police services I object to the lack of planning regarding infrastructure. For example, Garlicks Arch (Ripley/Send border). Without improvements to the infrastructure prior to any development, the quality of life for current residents will deteriorate significantly and in many ways. Existing doctor’s surgeries and schools are already stretched or at capacity. Services such as the Villages Medical Centre in Send will have their services overwhelmed. Many public services (for example, the police) are suffering from funding cuts or freezes. I object to the proposals due to the further burden it will put upon existing services. 4. Congestion on the motorways, roads and lanes I object to the development of the strategic sites due to A3 and M25 already being at capacity during peak hours. The developments will worsen the situation on the motorways, roads and lanes. Furthermore, Highways England has no plans to look at improving the A3 for a number of years. My village (Ripley) is already suffering from severe congestion for much of the day. For example, the top of Newark Lane leading to the high street is a bottleneck. It is very narrow and has an enormous amount of traffic attempting to get through – I live there and see it for myself every day. As well as being highly congested, there are numerous incidents of road rage. Many of the country lanes around the villages of Ripley, Send and Clandon are very narrow and wide enough for only one vehicle at a time. Road surfaces in general are in a poor condition and heavy traffic will make them worse. I object to further development as it will mean more traffic, more congestion, more frustration, more noise and more pollution. 5. Poor air quality I object to detrimental effect these developments will have on air quality. Further heavy traffic, particularly in built up residential areas, will only lead to greater levels of air pollution. 6. Parking I object to the new developments because parking is already a huge problem in Ripley. My partner and I do not even have a parking space. I can only imagine how much worse the situation will get with a larger population. 7. Disproportionate size of sites I object to the allocation of land to the strategic sites of Wisley Airfield, Garlicks Arch (Ripley/Send border) and Gosden Hill (Clandon). The proposed development of these sites will have a disproportionate impact on the surrounding local villages. They will have a permanent detrimental impact on each of these communities. 8. Unbalanced allocation of development in one area of the Borough Between the M25 and Burpham (a distance of only approx 5 miles) it is proposed that over 6,500 houses are built. This represents over 40% of the housing proposed in the Local Plan. I object to this area being hit so hard by the allocation of development, which is disproportionate to the rest of the Borough. 9. Capacity of utilities I object to the undoubted added burden on many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. I object to the development of Garlick’s Arch on the ground that there is little capacity in these networks. 10. Sites being planned in unsustainable locations I object to the location of these developments because many of the strategic sites e.g. Wisley Airfield and Garlick’s Arch, are in unsustainable locations. They do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. I object to the grounds that these sites are not sustainable. 11. Lack of proper pedestrian footpaths on local roads I object to these developments as footpaths in Ripley are already narrow and in some places non-existent. A further substantial increase in the local population will make navigating these footpaths more hazardous. 12. Heritage I object to the effect these developments will have on the area’s heritage. There are a number of heritage sites in the region and no account is being taken on the impact of these points of historic interest.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
6. The area around Site A42 in Tannery Lane, Send is highly congested and the increase from 45 houses to 60 will make the situation even worse. There are no proposals to improve the local narrow lanes and roads and this increase will impede the flow of traffic, especially during peak hours. Additional junctions will not help.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

This is a response to the updated Local Plan. I would like to strongly object to the new proposals which are even worse than before.

1. Over 40% of all the proposed development is now in the North East of the Borough which is too much for this small rural area. This will destroy the substantial parts of the precious Green Belt and will be extremely disruptive for residents. Furthermore, it will apply unsustainable pressure on roads, schools and GP surgeries.
2. Developments at Site A43 Garlick’s Arch will destroy substantial parts of the countryside. No need has been identified for this development. It is absolutely vital that the Green Belt is preserved – once it has gone, it will be gone forever. It will also encourage more building on green space throughout the country. Future generations will suffer for this loss.
3. Six additional Traveller plots have been added to the proposals for Garlick’s Arch (Section 4.2.22 of the plan). This is unbalanced and unfair. These plots and accompanying storage facilities are completely unsuitable for the rural area. Why do 75% of these plots have to be in Ripley?
4. The possibility of an additional 400 houses at the Site A43 Garlick’s Arch is extremely damaging for villages of Ripley, Send and Clandon and will lead to a further increase of the local population, bringing even more traffic to the area which means even poorer air quality and congestion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: psp172140  Respondent: 15136641 / Jason Dack  Agent:
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5. **At Site A58 Burnt Common**, there is a potential for a substantial yet unspecified increase in industrial floorspace from 7000sq m which is already a substantial amount. There is very little information on this in the document. This will adversely effect the unique rural character of the area and probably involve a substantial number of heavy goods vehicles using the lanes and roads. The local lanes are unsuitable for heavy vehicles and the increase in pollution will be intolerable.

7. There is a brief mention of a Waste Management Facility at **Site A58 Burnt Common**. We need more information on this and proper consultation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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j. I object to the lack of immediate provision for new schools.

k. I object to the lack of immediate provision for additional doctors surgeries.

Please ensure that these objections are taken fully into account.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
i. I object to the lack of evidence for the alleged number of houses needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/380   Respondent: 15136737 / D Padgett   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 2016 draft local plan on the following grounds.

1. I object to the erosion of the green belt which once lost can never be replaced.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/381   Respondent: 15136737 / D Padgett   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

f. I object to the disproportionate amount of development proposed for this area of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/178   Respondent: 15136737 / D Padgett   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
g. I object to the limited consultation period.
h. I object to the addition of new sites with less than 2 weeks notice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

NATS has reviewed the Local Plan. While we acknowledge that reference to our DVOR/DME installations is made on page 206, our preference would be to include a statement as follows:

- The airfield site hosts aeronautical navigation beacon, known as the Ockham DVOR/DME. This is an integral part of the UK aeronautical infrastructure and serves a number of major airports in the South East. When considering planning application(s), engagement with the operator (NATS En Route PLC) should be sought as early as practicable in order to ensure that any impact may be assessed and so that any relevant conditions and obligations to planning permission(s) can be attached.

in the table on page 205 ‘POLICY A35: Land at former Wisley airfield, Ockham’ under the REQUIREMENTS entry.

This is to highlight the importance of the aeronautical infrastructure and to ensure engagement with NATS is as early as possible should the current plans for the area be subject to alteration in any way.

Thanks and regards

Sacha Rossi

NATS Safeguarding Office

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
NATS has reviewed the Local Plan. While we acknowledge that reference to our DVOR/DME installations is made on page 206, our preference would be to include a statement as follows:

- The airfield site hosts an aeronautical navigation beacon, known as the Ockham DVOR/DME. This is an integral part of the UK aeronautical infrastructure and serves a number of major airports in the South East. When considering planning application(s), engagement with the operator (NATS En Route PLC) should be sought as early as practicable in order to ensure that any impact may be assessed and so that any relevant conditions and obligations to planning permission(s) can be attached.

in the table on page 205 ‘POLICY A35: Land at former Wisley airfield, Ockham’ under the REQUIREMENTS entry. This is to highlight the importance of the aeronautical infrastructure and to ensure engagement with NATS is as early as possible should the current plans for the area be subject to alteration in any way.

Thanks and regards

Sacha Rossi

NATS Safeguarding Office

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/385</th>
<th>Respondent: 15136897 / Victoria Grafton</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

"I OBJECT TO BUILDING ON THE GREENBELT"

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/141</th>
<th>Respondent: 15136929 / Richard Davis</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

Evidence

I object because:

- Guildford Borough Council’s Transport Assessment was not available to councillors for the vote taken on 24 May on the Draft Plan. Insufficient attention has been given to Infrastructure overload;

- Guildford Borough Council have not demonstrated the need to build on Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/192</th>
<th>Respondent: 15136929 / Richard Davis</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
Policy A43. 30 ha of land at Garlick’s Arch, Burnt Common, designated for 400 houses and 7,000 sq m of industrial and warehousing.

I object because:

- the site was not included in the regulation 18 draft and the site has not been consulted on previously;
- it is currently Green Belt and building on the site will undermine Send’s village status;
- a new 4 way interchange onto the A3 would make Send a through route for traffic leaving the A3 and M25 for Woking, overloading the road through Send village;
- proposed improvements to the A247 through Send would not alleviate the congestion situation because the bottleneck is at the Old Woking roundabout – there is simply no road capacity leading to the A247 from Woking to allow traffic to flow – there are already long queues and delays during peak times;
- the need for additional industrial development has not been demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/191  Respondent: 15136929 / Richard Davis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the Final Draft Local Plan and wish my comments to be seen by the Inspector.

Policy A44. 1.9 ha Land West of Winds Ridge and Send Hill designated for 40 homes and two Travellers Pitches

I object because:

- the site was not included in the regulation 18 draft and the site has not been consulted on previously;
- development for housing is inappropriate on this land which has Green Belt status. The land is currently used by myself and others for walking in a natural green environment;
- access to the site is limited due to the width of Send Hill road, single track from the proposed site entrance to its junction with Potters Lane and narrow throughout its length, with no pavement for pedestrians for most of its length;
- the number of (2) travellers pitches is out of proportion to the number of houses proposed (40)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/386  Respondent: 15136929 / Richard Davis  Agent:
Policy P2. Removal of Send from Green Belt

I object to Send being removed from the Green Belt. The land proposed for removal from the Green Belt provides a buffer between Guildford and Woking. Without this buffer the village of Send will lose its village identity and merge with the conurbations of Guildford and Woking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/181  Respondent: 15136929 / Richard Davis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Process

I object because Guildford Borough Council has not followed the correct process in including the above proposals in the Draft Plan. These are significant changes requiring consultation under Regulation 18, not the Regulation 19 process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/388  Respondent: 15137057 / Ian Phillipson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Road Network  The present roads in the area are already suffering from heavy traffic. The proposed housing
developments will considerably increase the problem - especially if the Wisley development goes ahead. It appears that
little attention has been directed at the management of traffic in this area. How will the road system be able to deal with
the problem?

Parking  If one assumes that every new house proposed has at least two cars, this will mean that the villages will have to
cope with 6000 more cars.  Think of the impact on local traffic and the need for car parking areas.

Facilities  Local schools are already full - where will all the extra children be taught? The present medical facilities are at
full capacity, and we know the great pressure there is at the moment on GPs.  How is this problem to be addressed?

Transport  How will the stations at Horsley and Effingham cope with a passenger load which now results in packed trains
at commuting times?

This is a summary of my main concerns over The Plan.  In essence, I, and my neighbours consider that the problems being
presented have not been given the serious attention that they really deserve and there appears to be an unstoppable force
behind it all!

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPP16/387  Respondent: 15137057 / Ian Phillipson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I consider that the proposals in the plan will result in the eventual loss of the Green Belt to a housing sprawl with suburban
London creeping further and further south.  Once the Green Belt has been used for urban
development, it is lost forever for future generations.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPP16/389  Respondent: 15137057 / Ian Phillipson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Flooding  At the moment the area has a real problem with flooding - not just in winter but all the year round. The drainage systems in the villages already cannot cope with heavy rain - building more properties will only exacerbate the problem

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<tr>
<th>Comment ID: PSLPS16/195</th>
<th>Respondent: 15137409 / Mark Costello</th>
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<tr>
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</table>

I object to Guildford Borough Council's draft local plan to build 1800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will destroy views from the Hog's Back ridge, remove 72 hectares of scenic farmland and additional ancient woodland from the green belt, increase tailbacks on the A31 and traffic congestion, result in rat-running through local roads and add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to site A43 Garlicks Arch

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to site A45 The Talbot. This is overdevelopment in a Conservation area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<td>I object to the lack of schools and Doctors surgeries etc if this housing is approved.</td>
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<td>I live nearby the area and listed below are my objections.</td>
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<td>I object to the erosion of the Green Belt.</td>
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</table>
I object to the removal of green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/392  Respondent: 15137409 / Mark Costello  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate amount of development in one area of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/397  Respondent: 15137697 / Phil Goodman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please accept this email as recognition of my firm objection to the Draft Local Plan. My primary objection is the proposed removal of Send, Ripley and Clandon fro the Green Belt. Changing this status will have a reversible detrimental effect to these areas.

As a local resident, I have been on the receiving end of planning refusal from Guildford Borough Council on the grounds of green belt. Whilst this restricted what I want to do to my home, I understood that GBC were following a plan to protect the green belt, and I admired this.

The complete turnaround by GBC is hugely disappointing.

I feel the whole process has been managed appallingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
As a resident of Tannery Lane, I particularly object to the proposal to inset Send Business Park from the Green Belt. Tannery Lane and the surrounding roads are already under pressure from disproportionately high traffic. Further expansion or development will hugely detract further from the green belt and current feeling of relative rural peace.

I and my family, neighbours and local residents will continue to pursue our objections for as long as it takes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I am unable to understand the rationale for the plans at Ripley/Send and Clandon.

I particularly object to:

- Erosions of the green belt
- In-setting
- High development in a single borough
- Limited consultation
- Last minute inclusions of expanded sites
- Lack of evidence for housing need
- The lack of provision of schools in the plan
- The lack of other services (e.g., GPs) in the plan
- The lack of any thought on roads and traffic access

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? (  )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The impact on the community would be huge and the already stretched infrastructure such as doctors surgeries and schools would drown under the proposed plan.

Please confirm receipt of my objection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/405  Respondent: 15137825 / Lianne Sherlock  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? (  )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am a resident of Ripley [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] and I am deeply concerned about the proposal to build over 14,000 new homes many of which at Garlicks Arch, Wisley and Gosden Hill.

This will have a devastating impact on the community and the effective erosion of the Green Belt is simply scandalous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/406  Respondent: 15137825 / Lianne Sherlock  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? (  )

Answer (if comment is on questions 1-7 of the questionnaire): ()
It is a hugely disproportionate development for one area of your Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: SQLP16/182</th>
<th>Respondent: 15137825 / Lianne Sherlock</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The limited consultation period is very suspicious and the last minute inclusion of new sites is just pure ruthless greed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/202</th>
<th>Respondent: 15137921 / Jean Sylvester</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A37</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The second site that would seem to be a reasonable possibility is A37, Bell and Colvill Garage. Currently this is a rather messy area and a well designed site could improve it. The proximity to local buses is an added advantage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPS16/201</th>
<th>Respondent: 15137921 / Jean Sylvester</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A39</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

After studying the plan carefully it seems to me that the two proposed developments that might have some merit. Are A39, Ockham Road North, East Horsley, although careful planning would be needed for any residents to gain access to Ockham Road North.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/413  Respondent: 15137921 / Jean Sylvester  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Whilst accepting that some new houses are needed, especially smaller properties for people wanting to downsize, the current pattern seems to be to allow small properties to be demolished and huge properties built in their place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/414  Respondent: 15137921 / Jean Sylvester  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider that any of the other proposed sites are viable and strongly object to the boundaries of our villages being enlarged and land within these boundaries being removed from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/412  Respondent: 15137921 / Jean Sylvester  Agent:
### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Following the publication of the New Local Plan I would like to make the following comments:

The total number of houses proposed for East and West Horsley is totally disproportionate to the size of the existing villages. Unless new provisions are made before any houses are built the local schools and medical centre will be unable to cope with the vast increase in residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

### Comment ID: PSLPA16/146  Respondent: 15138049 / Mark Leonard  Agent:

### Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of immediate provision for new schools

I object to the lack of any immediate provision for doctors surgeries

I object to the lack of any immediate provision for car parking as the villages suffers now so this will be unbearable!

I am thinking of selling my house to move out of this chaos but now the price of my house will suffer because of this.

I am extremely disappointed resident and would like objections to be heard and responded to.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: PSLPA16/145  Respondent: 15138049 / Mark Leonard  Agent:

### Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of any evidence for the alleged housing need numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/203  Respondent: 15138049 / Mark Leonard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A43 Garkicks Arch

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/205  Respondent: 15138049 / Mark Leonard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A43a the on and off ramp at Clandon, this will only increase traffic in the village not help us at all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/206  Respondent: 15138049 / Mark Leonard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the A45 The Talbot as this is overdevelopment in a conservation area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/207  Respondent: 15138049 / Mark Leonard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A57 The Paddocks as this is unlawful

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/416  Respondent: 15138049 / Mark Leonard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to strongly object to the 2016 draft local plan. I live in Ripley High street and over the last 4 years have already seen allot of change to what was a lovely village and this has already gone downhill with all the permitted development and the local plan will only make matters worse in my eyes.

I would like to object to many points as follows:

I object to all erosion of the greenbelt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to any in-setting, removal of any villages from the Green Belt, that’s what we have brought into and should remain in

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate amount of development in one area of the borough, we have had enough done our bit

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the limited consultation period, you are not listening to the people that have to live and breathe it daily, our voice does not count.

I object to the last minute inclusion of new sites with less than 2 weeks’ notice, so someone could go on holiday and come back to find this!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Of particular concern to me and my family is that a more local level the proposals include:

- At least 148 more houses in East Horsley.
- At least 385 more houses in West Horsley.
- Both villages to be taken out of the Green Belt. The new boundary, (called the in-setting boundary) extends the old settlement boundary and includes some fields and open spaces. This means that if they aren’t already...
identified in the plan for development that they too, are vulnerable to future development. E.g Kingston Meadows (by East Horsley Village Hall) is included inside the insetting boundary – despite being a valuable green space. Why?

Similarly Horsley Tennis & cricket club at the end of Pennymead Drive is also inside the insetting boundary. Why?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/5516  **Respondent:** 15138273 / David Latin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

Of particular concern to me and my family is that a more local level the proposals include:

2,000 houses at Gosden Hill Farm (4.2 miles away).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/3743  **Respondent:** 15138273 / David Latin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them). The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCl).

I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPII) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Table:

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</table>
Of particular concern to me and my family is that a more local level the proposals include:

2,068 houses on the former Wisley Airfield (2.1 miles away).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5515  Respondent: 15138273 / David Latin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Of particular concern to me and my family is that a more local level the proposals include:

400 houses at Burnt Common (3.2 miles away).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/421  Respondent: 15138273 / David Latin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Concerns regarding the number of properties planning on being built in both East and West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10924  Respondent: 15138273 / David Latin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Schools: Local schools are already at capacity – where will newcomers go to school? No extra places are planned in the Horsleys, and the school places proposed at Wisley Airfield will not planned until many years into the project.

Medical facilities: Similar situation to the schools.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10922  Respondent: 15138273 / David Latin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Traffic and parking: Assuming that every new house has at least 2 cars, this means potentially 6,000 more cars within a three mile radius of the villages. The impact on local roads will be tremendous. Parking at Horsley & Effingham junction stations (which are already full), at the shops, at the medical centre and at the village hall will all be affected.

Local Road Network: In respect of the proposals for development at Wisley Airfield and for an upgrade the current A3 junction at Burntcommon to a full 4-way junction, SCC traffic modelling anticipates increased use of Guileshall Lane, Hungry Hill Lane and Tithebarns Lane for traffic accessing the A3 at Burntcommon in order to travel to Guildford and beyond. The SCC report states that “consequently, it indicates that further thought may have to be given to managing traffic in this area as part of a transport assessment should the development be progressed”. It appears that the Plan is proposing a strategic site at Wisley Airfield without even knowing what improvements to the local road infrastructure will be required. If that is the case for Wisley Airfield, then it is almost inevitably true for the proposed developments in East and West Horsley as well.

Pollution: The large increase in volume of traffic will cause an increase in nitrogen dioxide and particulates in the environment – already a cause for concern in several areas in the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8020  Respondent: 15138273 / David Latin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Loss of Green Belt land:** Sadiq Khan, new Mayor of London, has instructed London planners not to approve development on Green Belt Land within the M25. If we continue to build on our countryside it won’t be many decades before we have none left. Creeping development has led to almost continuous housing from Central London to Effingham. Is this to carry on to Guildford and beyond? (1,700 houses are planned for the Guildford.

These targets will also have a material adverse impact on the Metropolitan Green Belt across this area, despite all the political promises made to the contrary.

Accordingly this local resident OBJECTS to the Proposed Submission Local Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Flooding: The site behind Ockham Road North in East Horsley is partially a level 3 flood risk area, and local residents are well aware of how much standing water there is in their gardens after rain. Building on such land will only exacerbate the problem. We already know what happens to local roads when it rains – the drains can’t cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10921  Respondent: 15138273 / David Latin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Section 150 of the Housing and Planning Act 2016 states that a site, once identified in a Local Plan, is assumed to have permission to go ahead in principle, which means normal planning restrictions may be difficult to impose later

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8021  Respondent: 15138273 / David Latin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10920  Respondent: 15138273 / David Latin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The number of houses planned has risen to 693 houses per year over the next 20 years (compared with 652 per year in the 2014 Draft) and is more than double the 322 houses per year that was approved in the 2003 Local Plan.

65% of new houses in the Borough are to be built on land that is currently in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

When my family and I moved to the area we did so because of the village life style, and proximity to the green belt and rural environment. The local amenities cannot cope with such a large planned expansion and it would completely alter the place that we chose to make our home. At the heart of the problem is GBC’s desire to pursue a ‘Forced Growth’ policy which results in highly aggressive and unjustified targets being set for housing development in the Borough. These excessive targets – the proposed 25% increase in housing stock in particular – create a tremendous strain on both land and infrastructure in an already over-crowded and over-stretched part of the country.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Little notice has been taken of the comments received after the last round of consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/148  Respondent: 15138305 / A Cripps  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of immediate provision for new schools

I object to the lack of any immediate provision for doctors surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/147  Respondent: 15138305 / A Cripps  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of any evidence for the alleged housing need numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/419  Respondent: 15138305 / A Cripps  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all erosion of the green belt I object to removal of villages from the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

belt I object to disproportionate amount if development in one area if the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to Send Village being removed from the Green Belt. The recent decision to grant permission to rebuild the Vision Engineering factory on Green Belt land was acceptable, because the new factory is on land adjoining the old factory and which was already owned by the factory owners. These were exceptional circumstances and should not be seen as creating a precedent. One small exception should not, in my view, invalidate the whole concept of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/7294  Respondent: 15138433 / Sylvia Pyne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to building 45 houses at Clockbarn Nursery (Policy A42) because Tannery Lane is too narrow, and is inadequate for more vehicles. I myself was once nearly in collision with another car there, even though both vehicles were observing the speed limit. The other vehicle came round a sharp bend at speed, swerved to avoid my car (which by then was stationary) and damaged a wheel against the kerb.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7295  Respondent: 15138433 / Sylvia Pyne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A43, The Garlick’s Arch development. The 400 houses proposed would increase the existing population disproportionately to the existing population, and overwhelm the Villages Medical Centre and local schools. St. Bede’s School, Send is being rebuilt on the basis of existing pupil numbers, and the proposed expansion of population would very quickly make it inadequate. New housing developments attract predominantly young families with school age children.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7297  Respondent: 15138433 / Sylvia Pyne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the new interchange with the A3 at Burnt Common because this would attract a considerable increase of traffic on the A247 at Send Road and Send Barns Lane. In recent years there have been many road works on, or leading to, this road and the result has been complete gridlock.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7296  Respondent: 15138433 / Sylvia Pyne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A44 at Winds Ridge and Send Hill. The history of using this site for landfill waste makes it unsuitable for housing, and again Send Hill is too narrow a road to accept significant extra traffic. In particular – and again I speak from experience, having lived in Send for over 30 years – the junction of Send Hill with Potters Lane is very dangerous. Send Hill is very narrow and twisty at that point and has a steep gradient. On many occasions I have met vehicles coming in the other direction and one of us has had to reverse to allow the other to pass. Turning right from Send Hill into Potters Lane is particularly hazardous as both roads have no speed limit and cars tend to drive fast along Potters Lane even when approaching the poorly signposted concealed junction. Travellers’ vehicles turning into or out of Send Hill at that junction would exacerbate the danger, and if any such vehicle were of great length, safely manouevring it would be problematic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/423  Respondent: 15138433 / Sylvia Pyne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This will make the A247 almost impossible to use safely for crossing and the pollution will be increased dramatically. We seem to be selected because we are at the north end of the borough and other parts will not be affected by the fumes, or inconvenienced by the extra traffic which will come through the village to get to and from Woking.

I object to Send being taken out of the Green Belt. This will increase the potential for even more new housing than the existing proposals and and the rebuilt school will not have enough capacity for all the children who will move into, or will be born in the village. (policy P2 page 48)

I object to a new junction for the A3 being built at Send. (policy A43a page 223) Again this will increase traffic which
wants to go to London coming through the village.

I feel that the other parts of Guildford should take up a larger part of the new development, which as the plans stand will swamp our village.

I wish my comments to be seen by the inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/422  Respondent: 15138433 / Sylvia Pyne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In response to the new plans for Send, I wish to object to the fact that the plans that include Send and the surrounding area will have approximately half of the new buildings proposed for the whole of Guildford Borough. (policy S2 page 26)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/424  Respondent: 15138433 / Sylvia Pyne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 2,000 houses proposed for Wisley (policy A35 pages 124 and 203) and the 2,000 houses for Burpham. (policy 25 pages 124 and 225) Again they will be coming through Send Road (A247) and the roads adjoining will be gridlocked. We are a small village and the reason people move here is for the open aspect, which is also part of the "lungs for London". The pollution will make life very difficult for asthmatics like me who live on the main road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/149  Respondent: 15138849 / Anne Walters  Agent:
<table>
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<tr>
<th>Comment ID: PSLPP16/428</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the disproportionate amount of development in one area of the borough</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the lack of consideration given for the already congested roads along the A3 and M25</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the lack of provision for new schools I object to the lack of provision for doctors surgeries</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all erosion of the green belt I object to the removal of any villages from the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SLP16/196  Respondent: 15138849 / Anne Walters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the limited consultation period I object to the last minute inclusion of new sites with less than 2 weeks notice

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/946  Respondent: 15138849 / Anne Walters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A43 change at Garlick's Arch because the number of homes is excessive and the addition of 8 travelling/show people pitches is unnecessary. Send Marsh is currently a flood zone and the addition of these houses is very worrying. It will generate much more traffic which at peak times blocks traffic in Send and Ripley. I object strongly to any more intrusion on the Green Belt in this beautiful area.

I object to Policy A58 at Burnt Common because there is no need to build warehouses in the middle of the Green Belt when there are many empty sites for this purpose at Slyfield and Guildford. This would also create more traffic on already congested roads.
I object to any more.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPS16/211</th>
<th>Respondent: 15140065 / Daron Jones</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Just emailing my protest at all the houses you want to build in send marsh and the surrounding areas, not only is this area already over populated and trying to get from home to work in rush hour is manic as it is, and you want to add more congestion and add the the problems, it's crazy! We also have a hard enough time trying to get an appointment at the doctors surgery so adding more people to this area will be making matters worse than what they already are, same goes with the schools, this is an increasing problem, I'm sure I do not need to say any more, we pay a premium to live in a village and what you are proposing to do is going to turn our lovely villages into a town, and myself like many others bought our houses away from the hustle and bustle of busy towns, I see this is not a government proposal and only a Guildford borough council one, I strongly disagree with what you are wanting to do, it would make many people viewing your plans very angry and see GBC as being greedy and just thinking of the profits many more houses would bring in. This is a protest from my household not only myself and that's 5 people.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td></td>
<td>I OBJECT to the lack of any evidence fort the alleged housing numbers.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<th>Comment ID: PSLPS16/212</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The GBC plan to build over 14,000 new homes under the revised draft local plan such as Garlicks’ Arch, Wisley and Gosden Hill.

It is bad enough getting out of Send Marsh Road onto Portsmouth Road in rush hour times and this area CANNOT cope with additional housing and traffic. Soon there will be a fatal collision as the roads cannot cope with this extra traffic.

The extra road traffic will also affect the M25 around junction 10 and the A3 south bound to Guildford. Both of which can be very congested. It's not just the amount of vehicles, but the extra noise and air pollution they will emit.

We purchased Bramble way in Send Marsh specifically because it was in a green belt environment. We do not want this green belt taking away and becoming a suburb of Guildford/Woking which it will become with no green space in between and a mass of housing and traffic.

Therefore I want to formally confirm that:

I OBJECT TO any/all erosion of the green belt
I OBJECT to any 'in-setting' of any villages from the green belt
I OBJECT to the planned development in one area of the borough which cannot sustain this
I OBJECT TO the limited consultation period and last minute inclusion of new sits with less than 2 weeks notice - THIS IS UNACCEPTABLE
I OBJECT to the lack of provision for new schools and doctors which are already under strain with the population increase
I OBJECT to the lack of any evidence for the alleged housing numbers.

We do not wish to live in a large town hence we moved to a village in the green belt.

There are sufficient brown sites available and Woking and Guildford are already inundated with tower blocks of new flats.

We strongly object to the way Guildford B.Council is attempting to reduce green belt and built houses and incur congestion where it is not appropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<p>| Comment ID: | PSLPP16/9755 | Respondent: | 15140225 / Stephen Reed | Agent: |
|            |              |            |                           |
| Document:  | Proposed Submission Local Plan: strategy and sites 2016 / Policy D1 |</p>
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<th>Comment ID: PSLPP16/9758</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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We do not wish to live in a large town hence we moved to a village in the green belt.

There are sufficient brown sites available and Woking and Guildford are already inundated with tower blocks of new flats.

We strongly object to the way Guildford B.Council is attempting to reduce green belt and built houses and incur congestion where it is not appropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID: PSLPP16/9754**  **Respondent: 15140225 / Stephen Reed**  **Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the lack of provision for new schools and doctors which are already under strain with the population increase

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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The extra road traffic will also affect the M25 around junction 10 and the A3 south bound to Guildford. Both of which can be very congested. It's not just the amount of vehicles, but the extra noise and air pollution they will emit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9756  Respondent: 15140225 / Stephen Reed  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO any/all erosion of the green belt

I OBJECT to any 'in-setting' of any villages from the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9757  Respondent: 15140225 / Stephen Reed  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the planned development in one area of the borough which cannot sustain this

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1301  Respondent: 15140225 / Stephen Reed  Agent:
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): (Yes)</td>
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<tr>
<td>I object. The proposed development on A44 Send Hill will have a major negative impact on the surrounding areas, the roads are not suitable to handle the additional traffic and the numbers of vehicles that will be generated by both the additional housing but particularly the travellers sites which will attract a higher proportion of caravan, trades vehicles and [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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I object, the developments that are proposed for A44 will have a significant negative impact on the surrounding areas and in particular the road network in the area. The additional housing and in particular the travellers sites will generate significant additional traffic and parking based on the fact that most private homes now have between 1 and 3 cars / vans and the travellers sites also have a high concentration of caravans, trades vehicles and other trade related paraphernalia that is both unsightly and a danger to the environment.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: SLP16/189</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object, GBC have not followed the correct process. Since 2014 GBC has changed every major site in Send the proposed for development and now just added a massive new Road junction. The 2014 proposal for 430 houses went down in April 2016 to 285 And has just gone up again to 485. These significant changes required another full consultation and regulation 18, not the short cuts of regulation 19 which GBC are trying to get away with.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Comment ID: SLP16/190</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object. The areas surrounding the A44 development will be negatively impacted by the developments that are proposed. This is a new proposal and was not included in Regulation 18 and has not been consulted on. The subsoil has been proven to contain documented unsafe landfill and should not be disturbed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<tr>
<th>Comment ID: SLP16/191</th>
<th>Respondent: 15140289 / Francis Pearse</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object, A44 was not included in the original plan and has not been consulted on.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/192  Respondent: 15140289 / Francis Pearse  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/193  Respondent: 15140289 / Francis Pearse  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object. In particular the A44 proposal is detrimental to the local area, it wasn't consulted on and was added to the Local Plan a long way down the process. The sites being proposed for the travelers is known to have dangerous landfill and these need to be left undisturbed.

The increase in traffic on Send Hill Road, Potters Lane in particular will increase the likely hood of pedestrian danger and damage to the surrounding areas including personal property.

Modern housing and in particular traveller sites attract a higher proportion of vehicles and in particular trades related vehicles, vans, lorises, tipper trucks and trade related materials. This site is not conducive to this type of occupation.
<table>
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<tr>
<th>Comment ID: PSLPA16/2335</th>
<th>Respondent: 15140417 / Jeff Greenwood</th>
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<td>I object to the lack of evidence for the alleged housing numbers needed</td>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1) I object to all erosion of the Green Belt
2) I object to the site A43 Garlicks Arch
3) I object to the A43a the on and off ramp at Clandon - this will increase traffic problems in the villages, not help them!
4) I object to the site A45 The Talbot - This is over development in a conservation area
5) I object to the A57 The Paddocks - this is unlawful
6) I object to any "in-setting" (ie removal) of any villages from the Green Belt
7) I object to the disproportionate amount of development in one area of the Borough
8) I object to the limited consultation period
9) I object to the last minute inclusion of new sites with less than 2 weeks notice
10) I object to the lack of evidence for the alleged housing numbers needed
11) I object to the lack of provision for new schools
12) I object to the lack of any immediate provision for Doctors Surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPS16/4449</th>
<th>Respondent: 15140417 / Jeff Greenwood</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the site A43 Garlicks Arch

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<p>| Comment ID: PSLPS16/4451 | Respondent: 15140417 / Jeff Greenwood | Agent: |</p>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
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| Comment ID: PSLPP16/9707  Respondent: 15140417 / Jeff Greenwood  Agent: |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all erosion of the Green Belt

I object to any "in-setting" (ie removal) of any villages from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9708  Respondent: 15140417 / Jeff Greenwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate amount of development in one area of the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1293  Respondent: 15140417 / Jeff Greenwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the last minute inclusion of new sites with less than 2 weeks

I object to the limited consultation period

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPA16/152</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>7) I object to the lack of provision of new schools</td>
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<td>8) I strongly object to lack of provision of doctors surgeries</td>
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<td>6) I object to the alleged housing needs</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</tbody>
</table>
Access to and from Newark Lane is already a major problem, especially after all the new homes that have just recently been built in Wentworth and Newark Lane, what will the increase in traffic do to this! Gridlock!

The local facilities ie policing, shops and restaurants will not be able to cope!

STOP THIS NOW!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/439</th>
<th>Respondent: 15140481 / Jayne Grant</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
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1) I object to loss of the Green Belt

2) I object to removal of villages from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<th>Comment ID: PSLPP16/440</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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</table>

3) I object to the disproportionate amount of development in one area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/441</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Many of us already suffer with breathing problems and the increase in the amount of fumes from cars will affect this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: SQLP16/202</th>
<th>Respondent: 15140481 / Jayne Grant</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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4) I object to the limited consultation period

5) I object to sneaky last minute inclusion of new sites

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLP16/10822</th>
<th>Respondent: 15140513 / Julie Wilkinson</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
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These locations are very special villages with a strong village atmosphere with many events and activities encouraging the villages to thrive as they do today. The fact they are in the green belt make them and keep them special. The planned increase in housing will encroach and destroy these small quintessential English villages which help retain British heritage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/10823  **Respondent:** 15140513 / Julie Wilkinson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We are already struggling to provide good quality education to our children locally and the increase in housing will only add to this pressure, not to mention the burden on local infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/442  **Respondent:** 15140513 / Julie Wilkinson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a current resident in the local Ripley area I specifically object to the villages of Ripley, Send and Clandon being removed from the green belt. These locations are very special villages with a strong village atmosphere with many events and activities encouraging the villages to thrive as they do today. The fact they are in the green belt make them and keep them special. The planned increase in housing will encroach and destroy these small quintessential English villages which help retain British heritage.

We are already struggling to provide good quality education to our children locally and the increase in housing will only add to this pressure, not to mention the burden on local infrastructure.

This consultation has not been fair, with a limited consultation period and last minute changes with the inclusion of new sites.

Please reconsider your plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/10820  **Respondent:** 15140513 / Julie Wilkinson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

---
As a current resident in the local Ripley area I specifically object to the villages of Ripley, Send and Clandon being removed from the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1358  Respondent: 15140513 / Julie Wilkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

This consultation has not been fair, with a limited consultation period and last minute changes with the inclusion of new sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2344  Respondent: 15140641 / Sandra Greenwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

I object to the lack of any immediate provision for Doctors Surgeries.

I object to the lack of provision for new schools

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<table>
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<tr>
<th>Comment ID: PSLPA16/2345</th>
<th>Respondent: 15140641 / Sandra Greenwood</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to the lack of evidence for the alleged housing numbers needed

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<table>
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<th>Comment ID: PSLPS16/217</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

1) I object to all erosion of the Green Belt
2) I object to the site A43 Garlicks Arch
3) I object to the A43a the on and off ramp at Clandon - this will increase traffic problems in the villages, not help them!
4) I object to the site A45 The Talbot - This is over development in a conservation area
5) I object to the A57 The Paddocks - this is unlawful
6) I object to any "in-setting" (ie removal) of any villages from the Green Belt
7) I object to the disproportionate amount of development in one area of the Borough
8) I object to the limited consultation period
9) I object to the last minute inclusion of new sites with less than 2 weeks notice
10) I object to the lack of evidence for the alleged housing numbers needed
11) I object to the lack of provision for new schools
12) I object to the lack of any immediate provision for Doctors Surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

---
Comment ID: PSLPS16/4462  Respondent: 15140641 / Sandra Greenwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the site A43 Garlicks Arch

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4461  Respondent: 15140641 / Sandra Greenwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the A43a the on and off ramp at Clandon - this will increase traffic problems in the villages, not help them!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4464  Respondent: 15140641 / Sandra Greenwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the site A45 The Talbot - This is over development in a conservation area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4466  Respondent: 15140641 / Sandra Greenwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the A57 The Paddocks - this is unlawful

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9729  Respondent: 15140641 / Sandra Greenwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I object to all erosion of the Green Belt

I object to any "in-setting" (ie removal) of any villages from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9731  Respondent: 15140641 / Sandra Greenwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
**Comment ID:** SQLP16/1295  **Respondent:** 15140641 / Sandra Greenwood  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

I object to the disproportionate amount of development in one area of the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/2617  **Respondent:** 15140705 / Simon Moxon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

I object to the last minute inclusion of new sites with less than 2 weeks notice

I object to the limited consultation period

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I can see no proper provision for new schools, where will children be educated? All local schools are operating at or very close to capacity.

No provision for increased Doctor’s surgeries, waiting lists are long enough and these proposals will completely overwhelm any semblance of an efficient GP service. This will put peoples lives and general wellbeing at risk.

No provision for extra Policing in the area and, having retired from Surrey Police less than a month ago, I can assure you there is no plan to increase Police numbers to cover the proposed increase in the local population. Like every Force in the
country Surrey Police are massively overstretched and suffering from recent government cuts to the Policing bill which will continue for the life of this parliament. This will put peoples safety at risk.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10871  Respondent: 15140705 / Simon Moxon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The local road network is already over capacity and the increase in traffic will gridlock Ripley village and surrounding areas especially during rush hours. Simply put, our roads were not designed for the amount of traffic now on our roads let alone what your plan proposes.

I suffer with a respiratory disorder made worse by heavy traffic pollution, your proposed plan and the increase in traffic will severely affect my breathing.

Ripley already has a massive shortage of parking for vehicles, the proposed plan will make the situation far worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/450  Respondent: 15140705 / Simon Moxon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object in the strongest possible terms your 2016 Local Draft Plan, especially the removal of Ripley and surrounding areas from the green belt which will be the absolute death of our village.

The main reasons from my objection are, but not limited to, the following:

1. Your consultation period has been minimal and not allowed enough time for people to fully take in the massive changes proposed.
2. The consultation document is nearly 2000 pages and is not designed for the layman to read and understand, probably deliberately.
3. There needs to be special circumstances to remove an area from the green belt and I do not believe your proposals satisfy/meet those circumstances.

4. I can see no proper provision for new schools, where will children be educated? All local schools are operating at or very close to capacity.

5. No provision for increased Doctor’s surgeries, waiting lists are long enough and these proposals will completely overwhelm any semblance of an efficient GP service. This will put peoples lives and general wellbeing at risk.

6. No provision for extra Policing in the area and, having retired from Surrey Police less than a month ago, I can assure you there is no plan to increase Police numbers to cover the proposed increase in the local population. Like every Force in the country Surrey Police are massively overstretched and suffering from recent government cuts to the Policing bill which will continue for the life of this parliament. This will put peoples safety at risk.

7. The disproportionate size of development sites in relation to the rural locations, in particular the Garlicks Arch proposal in Ripley. A development of this size will have a permanent and detrimental affect on our community for all the reasons listed above.

8. The local road network is already over capacity and the increase in traffic will gridlock Ripley village and surrounding areas especially during rush hours. Simply put, our roads were not designed for the amount of traffic now on our roads let alone what your plan proposes.

9. I suffer with a respiratory disorder made worse by heavy traffic pollution, your proposed plan and the increase in traffic will severely affect my breathing.

10. Ripley already has a massive shortage of parking for vehicles, the proposed plan will make the situation far worse.

I say no to the entire plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The disproportionate size of development sites in relation to the rural locations, in particular the Garlicks Arch proposal in Ripley. A development of this size will have a permanent and detrimental affect on our community for all the reasons listed above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1366  Respondent: 15140705 / Simon Moxon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The consultation document is nearly 2000 pages and is not designed for the layman to read and understand, probably deliberately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1365  Respondent: 15140705 / Simon Moxon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Your consultation period has been minimal and not allowed enough time for people to fully take in the massive changes proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Respondent: 15140737 / Hazel Killick</th>
<th>Agent:</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I support this policy of retaining this land for allotment use, as a housing development on this land will create far too much of an increase car traffic through the estate.</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I support this policy of retaining this land for allotment use and consider that any type of housing development will cause a great deal more car traffic which the estate cannot take.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<th>Comment ID: PSLPP16/453</th>
<th>Respondent: 15140801 / Penny Alison</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
I am writing to lodge my objection to the Draft Local Plan.

I recognise that more housing is needed but the plans for the Lovelace Ward are entirely impractical - as recently evidenced by the unanimous rejection of the plans by Guildford Borough Council planners.

The reasons for my objection are many but are dominated by concerns over traffic in this area. Already, at all times of the day, the roads are at maximum capacity. A short time spent at both the A3/M25 junction and Ripley High Street would immediately prove the point.

The principal grounds for my objection are:

1. DAILY TRAFFIC CHAOS would inevitably ensue on roads that are already overloaded and frequently subject to long queues and traffic jams. Indeed, Junction 10 of the M25 features frequently on national traffic reports.
2. OVERLOADING OF PUBLIC TRANSPORT, SCHOOLS, HEALTH SERVICES and PUBLIC SERVICES, all of which are already at maximum capacity and subject to lengthy waiting times.
3. AIR POLLUTION from thousands more cars. Why consider creating the same problems with which London is currently having to contend?

If there is any concern at all in the council for the quality of life of residents and our environment, this plan will be rejected forthwith.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I have some fundamental concerns regarding the 2016 draft local plan. Specifically, I am concerned by:

- The lack of any evidence for the alleged housing needs
- The disregard for infrastructure needs to support these proposals, including overloaded schools, doctors surgeries, hospital capacity, roads and public transport
- The erosion of the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am concerned by the erosion of the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/2604</th>
<th>Respondent: 15141089 / Ian Holms</th>
<th>Agent:</th>
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We object to the lack of any evidence for the alleged housing need numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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We object to all erosion of the green belt

We object to the removal of ANY villages from the green belt

We object to the limited consultation period

We object to the last minute inclusion of new sites with less than 2 weeks notice

We object to the lack of any evidence for the alleged housing need numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the 2016 Draft Local Plan as follows:
I object to all erosion of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the proposed disproportionate amount of development in one area of the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/158</th>
<th>Respondent: 15141409 / Barry Summerfield</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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Do you consider this section of the document; complies with the Duty to Cooperate?  ( ), is Sound?  ( ), is Legally Compliant?  ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of immediate provision for new schools
I object to the lack of any immediate provision for doctors surgery

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/160  Respondent: 15141409 / Barry Summerfield  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate?  ( ), is Sound?  ( ), is Legally Compliant?  ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of immediate provision for new schools
I object to the lack of any immediate provision for doctors surgery

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/157  Respondent: 15141409 / Barry Summerfield  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate?  ( ), is Sound?  ( ), is Legally Compliant?  ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of evidence of any alleged housing number needs

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<td>With reference to the above plan I strongly object for the following reasons</td>
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<tr>
<td>I object to all erosion of the green belt I object yo any &quot;insetting&quot; I'd removal of any villages from the green belt</td>
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<tr>
<td>Cc'd Sir Paul Beresford as our MP requesting he consider and invoke the conservative election mandate to &quot;SAVE THE GREEN BELT&quot;</td>
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With reference to the above plan I strongly object for the following reasons

I object to all erosion of the green belt I object yo any "inserting" I'd removal of any villages from the green belt

Cc'd Sir Paul Beresford as our MP requesting he consider and invoke the conservative election mandate to "SAVE THE GREEN BELT"

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/475  Respondent: 15141409 / Barry Summerfield  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate amount of development in one area of the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/478  Respondent: 15141409 / Barry Summerfield  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate amount of development in one area of the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/206  Respondent: 15141409 / Barry Summerfield  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the limited consultation period I object to the last minute inclusion of new sites with less than 2 weeks notice

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/207  Respondent: 15141409 / Barry Summerfield  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the limited consultation period I object to the last minute inclusion of new sites with less than 2 weeks notice

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/162  Respondent: 15141633 / Bav Majithia  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to [...] the lack of immediate provision for new schools and doctor surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/161  Respondent: 15141633 / Bav Majithia  Agent:
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<td>I object to all erosion of the Green belt.</td>
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<tr>
<td>The disproportionate amount of developments suggested in one area of the borough I strongly object to.</td>
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<tr>
<td>The last minute inclusion of new sites with less then 2 weeks notice and the limited consultation period I object to.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<th>Comment ID: PSLPP16/481</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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<td>I am writing with reference to the New Local Plan 2016. It would unthinkable to allow these developments to happen. The roads around Horsley cannot cope with the influx of new homes in the villages. Schools are already oversubscribed and this would put added pressure on them. The village cannot withstand another 533 homes being built. It is just not possible. The infrastructure is just not there.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<th>Comment ID: PSLPA16/163</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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</table>
Reference: Object to Draft Local Plan

I am writing to raise my objections to the Local Plan to build new houses in the Lovelace Ward. The plan if it goes ahead is flawed for the following reasons:

1) The increase in local traffic and making worse the current problems of congestion on the A3
2) Closing off roads and changing two way to one way routes forcing local traffic onto the A3
3) Increased demand on local schools and surgery places where there is currently over subscription
4) Local roads are already under maintained with pot holes and the increase in local traffic will make matters worse
5) Concern to the increase in air pollution
6) Lovelace Ward is a Green Belt area and should be respected and valued

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/484  Respondent: 15141761 / Louise Jelly Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This site would be protected under birds and habitats directives. Wildlife and land would be harmed by development proposed.

This is an area of outstanding natural beauty.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/482  Respondent: 15141761 / Louise Jelly Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Thank you for your standard letter and wanting to know our objections to this ridiculous application and all below should be considered, so here they are:-

This area is in Green Belt Land and should not be built on for homes or dwellings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/483  **Respondent:** 15141761 / Louise Jelly  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Finally the retention of this land in green belt is absolutely clear from petitions and letter support sent to Guildford Borough Council over so many years that the residents and locals do not want this development to take place.

Please reply with a personal letter not standard.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/485  **Respondent:** 15141761 / Louise Jelly  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This site maybe prone to flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/487  **Respondent:** 15141793 / Paul Peters  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This site would be protected under birds and habitats directives. Wildlife and land would be harmed by development proposed.

This is an area of outstanding natural beauty.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

Thank you for your standard letter and wanting to know our objections to this ridiculous application and all below should be considered, so here they are:-

This area is in Green Belt Land and should not be built on for homes or dwellings.

Finally the retention of this land in green belt is absolutely clear from petitions and letter support sent to Guildford Borough Council over so many years that the residents and locals do not want this development to take place.

Please reply with a personal letter not standard.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
This site maybe prone to flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/165  **Respondent:** 15141953 / R Pomphrey  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of immediate provision of new schools

I object to the lack of an immediate provision for doctors surgeries

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/164  **Respondent:** 15141953 / R Pomphrey  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of evidence for the need to provide such high housing numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/232  **Respondent:** 15141953 / R Pomphrey  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the Wisley airfield site despite rejection by GBC of it's unsuitability

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/229  Respondent: 15141953 / R Pomphrey  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A43 Garlick's Farm

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/230  Respondent: 15141953 / R Pomphrey  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A 45 The Talbot , this is overdevelopment in a conservation area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/231  Respondent: 15141953 / R Pomphrey  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57
### Comment ID: PSLPP16/490  
**Respondent:** 15141953 / R Pomphrey  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

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</table>

I object to site A57 The Paddocks - this is unlawful

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: PSLPP16/489  
**Respondent:** 15141953 / R Pomphrey  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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</table>

I object to any "in setting" of villages from the Green Belt

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: PSLPP16/491  
**Respondent:** 15141953 / R Pomphrey  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

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</table>

I object to all erosion of the GREEN BELT

I object to the effective destruction of rural communities by over development

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
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<td>I object to the disproportionate amount of development in one area of the Borough</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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<tr>
<td>The plans you are proposing would have devastating consequences for the local traffic. The stretch of A3 from M25 past Guildford is extremely busy both ways not only in the rush hours anymore. The traffic congestion starts well before 8am and continue pretty much all day. Suggesting that this stretch of A3 can take any more traffic resulting from building over 6500 houses is frankly insane.</td>
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</table>
Please have consideration for the local traffic connecting to A3 and the residents of the area using the local roads. We will end up in a situation where we cannot pull out of our drives to join the traffic on the main road through Send because it will be just solid queues both ways.

And adding another junction to A3 at Garlick's Arch is going to make traffic worse for both local roads and A3. I strongly object against adding another junction to A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/495  Respondent: 15142977 / Paulina Adair  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the local development plans for the areas around Send, Ripley and Clandon.

We have only recently moved to the area and we chose Send especially for its relative peaceful location and natural beauty. The development plans you are proposing would change the area to the extent we will not want to stay living here.

I object to the proposal of removing the villages (Send, Ripley, Clandon) from the green belt. I understand this can only be done in the special circumstances which is not the case here. Please consider other areas which are not in the green belt and therefore better suited for the housing or the commercial development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/497  Respondent: 15142977 / Paulina Adair  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Another fact I would like to raise is regarding the unbalanced allocation of development in one area of the Borough. The proposed 6500 houses to be built between M25 and Burpham represent more than 40% of the housing in the Local Borough. I object to one area being hit so hard, and the impact it will have on the local residents.

I really hope that the common sense will prevail at the end and the local development plans will be adjusted considering not only the impact on the residents of the area, the local traffic, but also preserving the natural environment.
Please make my comments available to the Inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Apparently there are irregularities in how the local plans were changed. The significant changes such as building 485 houses in Send instead of previously agreed number of 185 require another full consultation under Regulation 18 and not the shortcut of Regulation 19, the approach taken by GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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</table>

I object to the Policy A42 proposing to build 60 new homes instead of 45 home in Tannery Lane. We, the residents of Send, have objected to previously 45 houses. To increase the number to 60 houses would make the situation even worse with the traffic problems and the further erosion of the Green Belt. When reading the proposal, it makes me think that the planners have never visited the area around the Tannery Lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43 proposing to build 400 homes and 6 travelling show -people plots at Garlick’s Arch. There is no evidence that the travelling show-people plots in this area are needed. And is there solid evidence that 400 new houses are needed in this area? I have read different articles in the press suggesting that the estimates for the new housing in the area are overestimated especially now when Britain is entering the Brexit negotiations.

Have the planners considered the fact that this land is subject to frequent flooding and it currently a flood zone 2 allocation? Also, I thought that only in the “exceptional circumstances” the permanent Green Belt area can be built on. What constitutes “exceptional circumstances” in this case?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3433  Respondent: 15142977 / Paulina Adair  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the policy A58 proposing a minimum of 7,000 sq m if industrial or warehousing land. This proposal was deleted from the 2014 draft because of the number of objections. How can this be added again in 2017? There is no need to build commercial development on Green Belt especially when Slyfield and Guildford have empty sites and industrial units. The evidence shows a reduction in demand for industrial land (2017 Employment Land Need Assessment).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/168  Respondent: 15143073 / Sharon Rankin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the lack of immediate provision for new schools
I object to the lack of any immediate provision for Doctors surgeries

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/167  Respondent: 15143073 / Sharon Rankin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of any evidence for the alleged housing need numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/501  Respondent: 15143073 / Sharon Rankin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the environmental impact due to more cars on the road I object to the congestion caused due to the scale of buildings work

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/499  Respondent: 15143073 / Sharon Rankin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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<td>I object to the limited consultation period I object to the last minute inclusion of new sites with less than 2 weeks notice</td>
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<td>Comment ID: PSLP16/238</td>
<td>Respondent: 15143137 / Katie Zimmer</td>
<td>Agent:</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I have received your highway to hell flyer and I object to this.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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<td>DSCN1407.JPG</td>
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</table>

Let alone the natural beauty and vista that will be ruined by building an obscene amount of houses in the way. Only a matter of weeks ago, I parked up on the Hog's Back to take a photo of the London Skyline (attached). How could you possibly consider ruining this for people?!

I completely and utterly object.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: DSCN1407.JPG (760 KB)

<table>
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<tr>
<th>Comment ID: PSLPP16/502</th>
<th>Respondent: 15143137 / Katie Zimmer</th>
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<tr>
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</table>
I am writing to express my concern and opposition at the prospect of you building more properties on the area surrounding the Hog's Back.

Guildford itself is already unable to cope with the amount of traffic it already suffers. Building a further 1800 homes, with, presumably, an average of 2 cars per household, this will only make matters considerably worse. I drive across the Hog's Back every day and it is unbearable as it is.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPA16/169</th>
<th>Respondent: 15143265 / Steve Hartnell</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I am writing because I strongly object to the proposed new Local Plan. My reasons are:

The housing need figure is based on a methodology which has not been disclosed to the public – or indeed councillors. How can a plan progress or be agreed without anybody being in a position to assess such a fundamental component as the housing need? In my view it makes meaningful consultation impossible. A new assessment should be commissioned using a methodology that is transparent and capable of challenge if necessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<thead>
<tr>
<th>Comment ID: PSLPP16/504</th>
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<tr>
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The removal of East and West Horsley from the Green Belt and the proposition that 533 new houses be built in these crowded villages is excessive and unreasonable. The infrastructure and amenities are insufficient to support anything other than modest infill housing consistent with the existing status of these villages in the Green Belt. Roads are already busy and car parking facilities at the village shops and station would be overwhelmed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The proposals to remove significant areas of land from the Green Belt are wrong. The whole point of the Green Belt is to preserve open land, the boundaries should not be amended without very good reason and a potentially flawed housing need calculation is certainly not a good enough reason. I also note that the policy on which the Conservative party councillors were elected was that the Green Belt would be protected. To abandon this pledge would be undemocratic and dishonest.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

1. I OBJECT to the lack of immediate provision for new schools.
2. I OBJECT to the lack of any immediate provision for Doctors Surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the lack of any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/239  Respondent: 15143297 / Ronald Mounsey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to site A43 Garlicks Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/240  Respondent: 15143297 / Ronald Mounsey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to site A43a the on, and off ramp at Clandon. This will increase traffic problems in the villages, not help them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/241  Respondent: 15143297 / Ronald Mounsey  Agent:
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<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45</th>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>1. I OBJECT to site A45 The Talbot. This is over development in a conservation area.</td>
</tr>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>1. I OBJECT to site A57 The Paddocks, this is unlawful.</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
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<td>I wish to object to the 2016 draft local plan, and enter the following clear specific points as follows.</td>
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Comment ID: PSLPP16/506  Respondent: 15143297 / Ronald Mounsey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

1. I OBJECT to any “in-setting” ie. removal of any villages from the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/507  Respondent: 15143297 / Ronald Mounsey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

1. I OBJECT to the disproportionate amount of development in one area of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/212  Respondent: 15143297 / Ronald Mounsey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

1. I OBJECT to the limited consultation period.
2. I OBJECT to the last minute inclusion of new sites with less than 2 weeks notice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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1. I OBJECT to site A43 Garlicks Arch.

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Attached documents:

Comment ID: PSLPS16/244  Respondent: 15143393 / Susan Mounsey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

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Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to site A43a the on, and off ramp at Clandon. This will increase traffic problems in the villages, not help them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/245  Respondent: 15143393 / Susan Mounsey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to site A45 The Talbot. This is over development in a conservation area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/246  Respondent: 15143393 / Susan Mounsey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

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1. I OBJECT to any “in-setting” ie. removal of any villages from the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. I OBJECT to the disproportionate amount of development in one area of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</th>
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<tr>
<td>I object in addition to the lack of necessary provisions including schools and Doctors Surgeries.</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
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<tr>
<td>I object on the grounds that there is a lack of evidence to indicate the need for such a large proportion of new housing.</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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</table>
Comment ID: PSLPP16/513  Respondent: 15143553 / Danielle Rixon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I feel the main trunk roads, A3 and M25 are already at maximum capacity and increased traffic and pollution would be detrimental to all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/511  Respondent: 15143553 / Danielle Rixon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to express my objection to the Draft local plan of 2016.

I object to the fact that it will result in the erosion of precious Green Belt land.
I object to the fact that 'in setting' will result in the removal of the villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/512  Respondent: 15143553 / Danielle Rixon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the large amount of development planned in one area within the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/214  Respondent: 15143553 / Danielle Rixon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Unrealistic and unfair consultation period.
I object to the fact there is a possibility of inclusion of new sites with only a mere two weeks notice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/515  Respondent: 15143649 / Noah James  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the number of houses proposed, the infrastructure limits cannot be ignored.
The scale of the home building project proposed is my biggest concern. The current infrastructure is already stretched with schools at full capacity, medical facilities are much the same with appointments impossible to get, the impact on the local road network which will have unthinkably high levels of traffic and a severe lack of parking. Everyday life will be impacted and even the usually pleasant commuting to London will be a misery with nowhere to park and fuller trains. These problems will only be enhanced by the proposed developments and they cannot be ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/514  Respondent: 15143649 / Noah James  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have studied the proposed Local Plan which Guildford Borough Council has now published for public opinion and my comments are set out in this email.

I object to the lack of protection shown for the Green Belt. I understood the local plan stated it would protect the Green Belt, this submission proves the opposite. 65% of developments will be made on land that is currently Green Belt. Green Belt should be appreciated, it's not just a view or a place to picnic, an escape from City life or even farmland, it's a big part of English heritage and East/West Horsley's identity. Further ramifications will be pollution from loss of green belt and added traffic and flooding from building on an area that is partially a level 3 flood risk already.

My wife and I moved back from London after university to start our family here and we believe it's important that this area of outstanding beauty is cherished or the future generations will not see the Green Belt benefits in the decades to come.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/247  Respondent: 15143681 / Mark Clover  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing as a very concerned resident of Send, to object to the proposed developments at Garlick's Arch, Burnt common and land on Winds Ridge Send Hill.

I strongly object to the removal of Send from the Green Belt, something that I thought the government had put on their manifesto to protect. As this is mainly a Conservative council I thought this is something that you would be looking to uphold. It seems I, like many other voters have been misled!

The Green Belt was established to limit this type of over development, and to remove it would merge Woking into Guildford. Once a field has been built upon it will never return to its original state, it will be lost forever!

I work as a Driving Instructor and use the roads daily. In the last five years my job has become increasingly difficult, just trying to get between pupils and to teach them safely. On average the A246 which runs through our village is completely blocked both morning and night at least twice a week. This can be due to a road repair in old Woking, a broken down lorry or more regularly now, a crash on either the A3 or M25 leading to vehicles exiting these roads in favour of the local roads.

The A247 has houses both sides for most of it with limited parking, so cars are parked on the road, reducing it to single lane status in many places. The junction with Broadmead roundabout leads in to small roads, already carrying far more cars than
they were ever designed to do. This road also has dense terrace housing with no parking other than on the road. Have you ever tried driving down this road in the evening or when the A3 is blocked? It is simply gridlocked. The air pollution from the stationary cars and lorries is awful!

The proposed development at Garlick's Arch and the new on off slip roads from the A3 will turn our village into a solid roadblock at peak times, the road simply cannot carry the increase in traffic the development will bring!

I believe this site was a late addition to the plan and was put through under Regulation 19, and has not been previously consulted upon! This land is covered with ancient woodland and protected by the NPPF. Surely this is one of the sites the Green Belt was set up to protect, and is protected by this government! The scale of housing and industrial development is beyond belief!

The other sites on Send Hill and Winds Ridge are on single track rural roads, again not consulted upon, some of which is landfill with vents visible above the ground. These are country roads, quite and peaceful places and not suitable for the kind of development that is being proposed!

I appreciate that Send needs to play it's part in filling the need for housing, but this is a clear case of overdevelopment! Get this wrong and village life and all it brings will be lost forever, in the name of wealth and greed!

Please pass my comments on to the Planning Inspector.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
The proposed development at Garlick's Arch and the new on off slip roads from the A3 will turn our village into a solid roadblock at peak times, the road simply cannot carry the increase in traffic the development will bring!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5412  Respondent: 15143681 / Mark Clover  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The other sites on Send Hill and Winds Ridge are on single track rural roads, again not consulted upon, some of which is landfill with vents visible above the ground. These are country roads, quite and peaceful places and not suitable for the kind of development that is being proposed!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10863  Respondent: 15143681 / Mark Clover  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I work as a Driving Instructor and use the roads daily. In the last five years my job has become increasingly difficult, just trying to get between pupils and to teach them safely. On average the A246 which runs through our village is completely blocked both morning and night at least twice a week. This can be due to a road repair in old Woking, a broken down lorry or more regularly now, a crash on either the A3 or M25 leading to vehicles exiting these roads in favour of the local roads.

The A247 has houses both sides for most of it with limited parking, so cars are parked on the road, reducing it to single lane status in many places. The junction with Broadmead roundabout leads in to small roads, already carrying far more cars than they were ever designed to do. This road also has dense terrace housing with no parking other than on the road. Have you
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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<tr>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I strongly object to the removal of Send from the Green Belt, something that I thought the government had put on their manifesto to protect. As this is mainly a Conservative council I thought this is something that you would be looking to uphold. It seems I, like many other voters have been misled! The Green Belt was established to limit this type of over development, and to remove it would merge Woking into Guildford. Once a field has been built upon it will never return to its original state, it will be lost forever!</td>
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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I appreciate that Send needs to play it's part in filling the need for housing, but this is a clear case of overdevelopment! Get this wrong and village life and all it brings will be lost forever, in the name of wealth and greed!</td>
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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Respondent: 15143681 / Mark Clover</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the changes to Policy A42 at Clockbarn in Tannery lane. The houses have now increased from 45 to 60, that's a 33% rise. GBC have totally ignored the hundreds of objections to this site. Tannery lane is a small country lane, it suffers from surface water flooding, it has no footpaths nor street lighting and is single track in its entire length! The road is a country lane! You drive along it with extreme care, as speeding motorists using it as a cut through while using a sat nav, forcing you into the hedges and up the banks. Tannery lane joins the A247 at a dangerous crossroads, where you have to edge out in hope you don't hit a speeding car on the busy main road! The newly painted double yellow lines prove worthless as cars still park on them making the sight lines dangerous!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2884  Respondent: 15143681 / Mark Clover  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the changes in policy A43 Garlick's Arch because yet again GBC has ignored the thousands of previous objections to this beautiful Green belt for which no ”exceptional circumstances ” exist !! The sight has ancient woodland dating back to Elizabeth 1st, it is currently a level 2 flood zone. To build on it would effectively join Ripley and Send and surely this defeats the entire purpose of the Green Belt. The proposed 400 houses and 6 plots for traveling show people and the massive traffic increase will cause total gridlock to our already over used, under funded infrastructure!!

We also have no where near enough school places for the current village, nor sufficient facilities to cover such an increase in the population at the Doctors surgery.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2887  Respondent: 15143681 / Mark Clover  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A58
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<th>Respondent: 15143713 / Naomi James</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the changes to policy A58 at Burnt common because GBC have changed this from a maximum of 7000 sq m of industrial space to a Minimum of 7000 sq m of industrial space, did you think we would not notice this?

There is simply no need to build in the middle of the Green belt when Slyfield & Guildford still have empty sites. In fact the latest research shows a reduction in the demand for industrial space. Yet again there were thousands of objections logged last time, and the proposal was dropped, so why is GBC reinstating it?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/516</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the number of houses proposed, the infrastructure is already limited.

The amount of houses proposed in the building programme is far too many for the current and proposed infrastructure. Medical facilities and schools are at full capacity, the local road network will suffer even higher levels of traffic and there will not be sufficient parking. People will struggle to find a space at the station and even if they do, trains into London and other transport will become over crowded.

My husband and I chose to raise a family in a peaceful and green environment, this proposed plan contradicts everything good about East and West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I reviewed the proposed Local Plan which Guildford Borough Council published and my objections are stated in this email.

I object to the lack of protection shown for the Green Belt.

The local plan stated it would protect the green belt and this isn't reflected in the proposal with 65% of developments made on current Green Belt land.

The loss of green belt and added traffic will cause pollution. Building on an area that is partially a level 3 flood risk will increase the likelihood of increased flooding which the drains cannot manage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/518  Respondent: 15143809 / Cathy Leblanc  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the number of homes proposed.
Quite simply there are too many houses proposed in this plan. We haven't got the infrastructure in place nor will the proposed infrastructure adequately satisfy the number of people the added homes will bring. With an average of 2-3 cars per family that could be 6,000 extra cars on the road, the local road network couldn't cope with the high levels of traffic and the current insufficient parking means finding a space at the doctors, shops or train station would be impossible. The transport overcrowding would make local and London commuting uncomfortable. The medical facilities and schools are at full capacity and these extra homes would only create a larger problem for everyone, the proposal doesn't enrich the community in any way.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/519  Respondent: 15143809 / Cathy Leblanc  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the loss of Green Belt. Not only will the added cars create more pollution but the loss of green belt land will only accelerate this problem. This land is important for our wider environment which reduces the effect of heat generated by cities. The land is a flooding area and in the past the drains haven't coped with heavy rainfall, building on that area will only further the problem. Building 65% of developments on Green Belt land is a direct contradiction to the local plan statements to protect the Green Belt and this proposal further highlights the little notice it's taken from previous comments in this community.

People who live here, live here because it is a protected Green Belt area of outstanding beauty. The negatives of this proposal outweigh the positives, this plan severely tampers with the identity of East and West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/176  Respondent: 15143841 / Colin Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not believe that the housing needs can have been properly identified, who will benefit from the 14000 new homes proposed?

This "Plan" needs to be scrapped and replaced by a well thought and researched proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/521  Respondent: 15143841 / Colin Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Therefore I strongly object to the 2016 draft local "Plan". In part because of the catastrophic effect that removing the three villages would have, but also because the "Plan" clearly includes minimal improvements in infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/520  Respondent: 15143841 / Colin Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Although I do not live in Guildford I am a regular visitor and know the Ripley, Send area well.

I cannot believe that planners intend to take Ripley, Send and Clandon out of the Green belt. What is the point of a Green Belt if you take out of it those areas which separate Greater London from the Surrey countryside? There was huge concern when the house at Clandon was burnt to the ground, but this proposal is many times more damaging to the future of the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/522  Respondent: 15143873 / S.M Dedman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I Object to the Garlicks Arch planned development.

My concern is the impact of such a large development would have on the community, which is already well stretched.

The A3 link roads entry and exit at Burnt Common won't ease the problem through Ripley village as the flow on A3 is often at a crawl at rush hour therefore cars now come of the A3 slip road to Burnt Common and Send and then rejoin the cue at Wisley for the M25, likewise people who live in Send etc will still join the A3 through Ripley because they know there is often a problem in the morning rush hour when traffic gets built up from the M25 back towards Burpham, and quite often its a build up on the South Bound carriageway especially in late afternoon tailing back from Guildford.

So the development at Garlick Arch will only bring more congestion on our roads, and extra pressure on schools medical centre etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/249  Respondent: 15143937 / Helen Strudwick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A42 – I object to the building of 45 houses at Clockbarn Nursery. Apart from this area being subject to potential surface water flooding this will just bring more traffic onto the A247 Send Road or feed it through narrow and single track rural roads towards Newark Lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/250</th>
<th>Respondent: 15143937 / Helen Strudwick</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43 - I object to the proposed employment space at Garlick’s Arch for the same reasons as above. The increase in HGV traffic, should this go ahead, will cause more congestion and damage to the roads in and around Send. I also object to the proposed 400 houses. This is a new site that has not previously been consulted upon; it was not included in the Regulation 18 draft. There is no need for these additional houses on top of the thousands already proposed for the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/251</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43a - I object to the proposed A3 junction for reasons of additional traffic congestion, damage to existing roads and reduced air quality and increased pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A44 - I object to the proposed development for housing and travellers pitches in Send Hill for the following reasons.

This is again a newly identified site and was not included in the Regulation 18 draft; it has not previously been consulted on and is therefore inappropriate to include it in this consultation.

Send Hill is a quiet residential road surrounded by countryside. There is insufficient access to the proposed site, it is inappropriate for the proposed purposes and not in keeping with the area. Indeed other private local planning applications have been turned down for this reason. The subsoil of the site contains documented unsafe landfill waste which is currently vented. The road is narrow, single track in places, with no footpaths and as the road is straight it is already used as a rat run for some vehicles to cut through to the A3.

The road is used by the George Abbott school bus and many school children walk along Send Hill to meet the bus at the junction with the A247. Additionally younger children walk with families to attend the primary school currently in Bush Lane at the end of Send Hill. Even when the school moves to its new site the children will still be walking along Send Hill to attend it. Increased housing and the resulting traffic will place these children at added risk. Indeed rather than building more homes Send Hill should be subjected to traffic calming measures to protect the children who walk to school and other residents.

Send Hill is home to a number of bats who require protection from development and there are native bluebells in the woodland which also need to be protected.

To conclude my objection to the plan I would like to mention the local services such as health centres and schools which are already under a huge burden.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the large number of houses proposed in the plan on all of the sites. The increased population will undoubtedly place extra traffic onto roads which already struggle to cope with the current population. The A247 through Send is a small road in a bad state of repair due to traffic loading. During certain periods of the day the traffic queues back for more than a mile and as soon as any maintenance or service works are undertaken the road becomes realistically impassable during peak periods. The village of Old Woking provides a bottle neck for traffic heading toward Woking and Maybury and increasing population in Send and beyond will only exacerbate the situation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/527  Respondent: 15143937 / Helen Strudwick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I am writing with reference to the final draft local plan and would like to raise my objections.

With reference to the policies P2, A42, A43, A43a and A44 I object for the following reasons.

Policy P2 - Send is a small village community on the edge of Woking and it provides a buffer between the town and the open countryside. To remove Send from the Greenbelt is a short-sighted act of lunacy. Greenbelt is designed to provide protection from urban sprawl and to erode it in this way is irresponsible and indeed there were repeated specific election promises to protect it.

We are all custodians of our countryside and it needs protecting from reckless planners for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp173/324  Respondent: 15143937 / Helen Strudwick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am sadly having to write again to you as I don’t think that you have read my last letter. I was under the impression that I lived in a democracy and that the local councillors were elected by the people who live in a borough to serve them. They were in part elected on the basis of promises made to the electorate which as we all know, at least as far as planning is concerned, they have ridden roughshod over or completely ignored.

Tens of thousands of objections have been placed before you last year regarding the local plan and you not listened at all. Even allowing for the fact that further housing is necessary over the coming years it would appear that the area north of Guildford especially Send has been disproportionately targeted. At this point in time I understand that you will only allow objections to the changes you have made in the latest draft. With reference to the policies A42, A43 and A58.

I object to the proposal to inset Send Business Park from the Green Belt. This will allow future sprawling development over which we will have no control. We are all custodians of our countryside and we need to protect it for future generations. To allow this to happen will create the opportunity for future expansion or development at this location without consultation.

The housing demand number in the Local Plan has dropped by 39 houses per annum from 2018 to 2034, and despite this, Send’s contribution has been increased without any justification. Major sites in Send and Ripley have been changed 3 times; first we had Burnt Common, then Garlick’s Arch and now we have both. Guildford Borough Council appear to have a predetermined agenda to build on the Green Belt and without any constraints to take into account the lack of infrastructure such as roads, schools and medical facilities as required by law.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2537  Respondent: 15143937 / Helen Strudwick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the change in policy which has increased the number of houses to 60 (33% more) from the previously proposed 45 houses at Clockbarn Nursery. This area is subject to surface water flooding which this will exacerbate and will bring even more traffic onto the A247 Send Road. This will either create a bottleneck at the junction of the A247 and Tannery Lane or feed it through narrow and single track rural roads towards Newark Lane.

This policy change will increase the erosion of the Green Belt in our village and will impact upon open countryside views around the precious River Wey navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3293  Respondent: 15143937 / Helen Strudwick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the change in policy which has increased the number of houses to 60 (33% more) from the previously proposed 45 houses at Clockbarn Nursery. This area is subject to surface water flooding which this will exacerbate and will bring even more traffic onto the A247 Send Road. This will either create a bottleneck at the junction of the A247 and Tannery Lane or feed it through narrow and single track rural roads towards Newark Lane.

This policy change will increase the erosion of the Green Belt in our village and will impact upon open countryside views around the precious River Wey navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2538  Respondent: 15143937 / Helen Strudwick  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43 – I see that the proposed employment space at Garlick’s Arch has now been move to Burnt Common under Policy A58 and I will comment on that later. I object to the proposed 8 travelling show people plots on this site in addition to the 400 homes because there is no proven demand for them in this location and the lorries that will go along with these people will cause further congestion and pollution on the local roads.

The Local Plan H1 policy states that “Gypsy, Traveller or Travelling Show people accommodation should be provided on development sites of 500 homes or more whilst there remains an identified need”. Send has been disproportionately allocated 2 traveller pitches as well as 8 travelling show people plots identified as needed in the borough until 2034. The developments of over 1500 houses at Gosden Hill and Wisley are only allocated 8 pitches apiece during the same period. In addition the proposed location of these sites do not conform with the Guildford Borough Council’s own traveller policy in terms of the identified needs of this ethnicity of people; e.g. distance from schools, shops, transport and the need to join a community of people.

This land is ancient woodland allocated as Green Belt to avoid Ripley and Send being joined up. It is also subject to frequent flooding and has a flood zone 2 allocation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3294  Respondent: 15143937 / Helen Strudwick  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
I object to the proposed employment space at Burnt Common (formerly planned for Garlick’s Arch) as the increase in HGV traffic, should this go ahead, will cause more congestion and damage to the roads in and around Send. This was deleted from the 2014 draft due to the number of objections but following the smoke and mirrors move to the Garlick’s Arch site in 2016, it has now appeared back in its original location but with the maximum 7,000 square meterage now as the minimum – absolutely ludicrous. Since the 2016 plan there has been a decline in demand for industrial land and there is no need to create this from Green Belt land when Slyfield still has empty sites and industrial units. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares of industrial land for the whole of the borough yet the language of this policy A58 opens this site, of in excess of 9 hectares, to unlimited development well beyond what is in the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3295  Respondent: 15143937 / Helen Strudwick  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposed employment space at Burnt Common (formerly planned for Garlick’s Arch) as the increase in HGV traffic, should this go ahead, will cause more congestion and damage to the roads in and around Send. This was deleted from the 2014 draft due to the number of objections but following the smoke and mirrors move to the Garlick’s Arch site in 2016, it has now appeared back in its original location but with the maximum 7,000 square meterage now as the minimum – absolutely ludicrous. Since the 2016 plan there has been a decline in demand for industrial land and there is no need to create this from Green Belt land when Slyfield still has empty sites and industrial units. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares of industrial land for the whole of the borough yet the language of this policy A58 opens this site, of in excess of 9 hectares, to unlimited development well beyond what is in the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the proposal to inset Send Business Park from the Green Belt. This will allow future sprawling development over which we will have no control. We are all custodians of our countryside and we need to protect it for future generations. To allow this to happen will create the opportunity for future expansion or development at this location without consultation.

The housing demand number in the Local Plan has dropped by 39 houses per annum from 2018 to 2034, and despite this, Send’s contribution has been increased without any justification. Major sites in Send and Ripley have been changed 3 times; first we had Burnt Common, then Garlick’s Arch and now we have both. Guildford Borough Council appear to have a predetermined agenda to build on the Green Belt and without any constraints to take into account the lack of infrastructure such as roads, schools and medical facilities as required by law.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am sadly having to write again to you as I don’t think that you have read my last letter. I was under the impression that I lived in a democracy and that the local councillors were elected by the people who live in a borough to serve them. They were in part elected on the basis of promises made to the electorate which as we all know, at least as far as planning is concerned, they have ridden roughshod over or completely ignored.

Tens of thousands of objections have been placed before you last year regarding the local plan and you not listened at all. Even allowing for the fact that further housing is necessary over the coming years it would appear that the area north of Guildford especially Send has been disproportionately targeted. At this point in time I understand that you will only allow objections to the changes you have made in the latest draft. With reference to the policies A42, A43 and A58 I object for the following reasons:

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/8034  Respondent: 15144065 / Margaret Heard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object again in reference to policy P2, in particular to the land at Garlicks arch (A43) being removed from the green belt, as 'The Plan' states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch.

The site is not appropriate because:
• There is no sustainable transport infrastructure.
• The site is liable to frequent flooding
• It has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.
• There are no plans to improve local schools, medical or utilities to cope.

I object to development in areas which are at risk of flooding (Policy P4), as the Plan does not take properly address the flood risk as required by National Planning Policy. The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

I object to the proposed Infrastructure Schedule. The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)
There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

I object to the lack of proper infrastructure planning for sites (Policy II). The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/8035   Respondent: 15144065 / Margaret Heard   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)
North facing ramps to the A3 at Burnt Common would be a disaster for local communities, which do need to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. E.g. all traffic from London/M25 to Woking would go through Burnt Common, Send and Old Woking. This is not sustainable as this cannot be improved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/534   Respondent: 15144065 / Margaret Heard   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I have regularly been dismayed to discover that these developments with the promise of 'affordable housing' are far from 'affordable' with very little chance of young families, or local people being able to afford them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/531  Respondent: 15144065 / Margaret Heard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

These large developments bring with them a huge demand on already stretched local resources, overloading schools, health services and transport systems.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17826  Respondent: 15144065 / Margaret Heard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the congestion that will be caused on the roads of Ripley, Send and Clandon as per policy I1. These are, as already mentioned, in a terrible state of repair and any extra traffic will be even more detrimental to the infrastructure with no plans outlined for improvement either.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17828  Respondent: 15144065 / Margaret Heard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

Please seriously consider my objections against the plans and policies specified, as I strongly believe they are in the best interest for the communities, people, wildlife, heritage and future of the Ripley, Send and Clandon areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17827  Respondent: 15144065 / Margaret Heard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Further to this I object to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2) The A3 / M25 junction are already dangerous due to excess traffic and need to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the time frame of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/530  Respondent: 15144065 / Margaret Heard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I wish to lodge my strong objection to the Draft local plan.

The Councils disregard for the Protection of the Green Belt is of great concern.

The proposed removal of the villages from the green belt, will potentially allow disproportionate housing developments to be built.

As a Surrey resident for 35 years, I feel that the threat to Surrey and the villages surrounding Guildford has never been greater, do not destroy our heritage, and that of future generations by allowing the destruction of Surreys Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the removal of Ripley, Send and Clandon from the green belt. These areas have no reason to be removed from the green belt, other than to facilitate the unreasonable developments planned. Likewise the proposed (A35) Wisley airfield and (A43) Garlicks arch sites should not be removed from the green belt. These areas should remain protected from the ridiculous submitted 'local plan' policy P2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to proposed development in the local plan policy S1 as it is 'not sustainable'! The impact on local communities and to the infrastructure of these areas will be unbearable. The roads and local services are already in a terrible state of function and repair, so nearly 14,000 new homes planned for the Ripley, Send and Clandon areas alongside (A35) Wisley airfield and (A43) Garlick arch sites will not be at all sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The already overcrowded roads, will potentially see thousands of additional cars and commercial vehicles flood into the villages, where the lanes were never designed to accommodate them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

This brings with it the problem of pollution, which is a particular problem for the young and elderly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the fact that GBC have failed to provide sound evidence in terms of the Employment Land Needs Assessment which shows that industrial space at Burnt Common IS NO LONGER NEEDED.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT to policy A43.30 the development of new four way interchange onto the A3 which would mean that narrow Send Road (A247) would be the main route for traffic leaving the M25 and A3. It is already crowded and vulnerable to traffic jams. Further traffic from this development would result in permanent gridlock. It simply would not work.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT to policy A44 which would see 40 homes and two travellers' pitches on land west of Winds Ridge and Send Hill. This was again a NEW site NOT included in 18 draft and therefore has NOT been consulted on previously. Once again this is Green Belt land partly containing unsafe landfill. Access is by a narrow lane which could never take the volume of traffic that would ensue from traveller's pitches.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<td>I OBJECT to the fact that the Local Plan takes no account of schools, doctors surgeries and roads that are already operating at full capacity. Another 4000 houses in this area with a conservative estimate of a further 8000 cars would be catastrophic.</td>
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<td>I moved back to the area seven years ago after living in London and Hertfordshire and choose a village location due to easy access to the countryside. If I wanted to live in a built up area I would have bought a house in Guildford. We are surrounded by beautiful countryside, wildlife and great walks. I am writing to make my objections to proposed Garlick’s Arch and removal of the green belt.</td>
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<td>I OBJECT to the removal of 15 villages, including Ripley and Send, from the green belt. This will lead to wholesale, and often inappropriate developments.</td>
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I OBJECT to the fact that GBC have not followed the correct process for Send and Ripley developments. Any significant changes to the 2014 proposals, such as the proposal development of Garlicks Arch, should have required another full consultation, which did not happen. This invalidates the whole process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/545  Respondent: 15144225 / Donald Pitts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object because I believe the proposals will increase congestion on trunk roads (A3/M25)
2. I object because I believe the proposals will increase congestion on local village roads and lanes
3. I object because I believe our local roads are unsuitable for heavy vehicles
4. I object because I am concerned about the impact on air quality
5. I object because there is a lack of proper infrastructure planning
6. I object because there is insufficient utilities capacity
7. I object because I believe local healthcare facilities will be overwhelmed
8. I object because I believe local social welfare facilities will be overwhelmed
9. I object because I believe local policing will be inadequate
10. I object because I believe local shops and restaurants will be overwhelmed
11. I object because I believe there will be parking problems in local villages caused by larger populations
12. I object because I believe sites are being planned in unsustainable locations

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/546  Respondent: 15144225 / Donald Pitts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Please ensure my objections are considered as part of the consultation process and made available to the Inspector in due course.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/543  Respondent: 15144225 / Donald Pitts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to raise a number of objections to the Guildford Borough Proposed Submission Local Plan (strategy and sites 2016):

1. I object to the lack of protection being given to the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/544  Respondent: 15144225 / Donald Pitts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the size of the developments proposed for a rural location
2. I object to the unbalanced allocation of development in one area of the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2260  Respondent: 15144545 / Stacey Maxwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2179  Respondent: 15144545 / Stacey Maxwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently outside their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighborhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4339  Respondent: 15144545 / Stacey Maxwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to new sites (Garlicks Arch) being introduced as an afterthought when it was not even considered in the previous plan. A slip road on the A3 at Burnt Common has been added to the Draft Local Plan without Highways England consent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

Consideration for local communities
By allowing these ridiculous developments in totally unsuitable locations, such as Wisley Airfield and Garlick’s Arch, we are in danger of destroying local communities that have existed for years. The villages around these strategic sites are not suitable for turning into towns – for reasons stated above, the infrastructure and local amenities will not cope with a larger population. The needs of the local communities MUST come first. Once the Green Belt land is gone, it is gone forever so when will this end? The South East is being turned into a concrete jungle by ruthless property developers and it simply has to stop. I bought a house in a village as I wanted to be in a community surrounded by green fields, not to have views of housing developments and the implications that a larger population will bring. For this reason, and all reasons stated above, I STRONGLY OBJECT to the development proposed in the Local Plan.

I live in hope that common sense will prevail.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. No protection of heritage assets
   I STRONGLY OBJECT to the development proposed in the Local Plan as I don’t believe there has been any consideration for the protection of our heritage assets.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Lack of proper infrastructure
As with all large housing developments, no thought is ever given to the current infrastructure. Schools and doctors surgeries, to give just 2 important examples, are already at breaking point so how will building the amount of houses proposed in the Local Plan alleviate this? Put simply, it won’t. Much more thought has to be given to the local existing residents and impact on their quality of life. For these reasons, I STRONGLY OBJECT to the development proposed in the Local Plan.

Impact on utilities
The villages that surround these strategic sites are already close to capacity in terms of the electrical network and sewers so building a development such as Garlick’s Arch will have a catastrophic effect on these essential utilities. For this reason, I STRONGLY OBJECT to the development proposed in the Local Plan.

Lack of public transport
The sites at Wisley Airfield and Garlick’s Arch are in totally unsustainable locations as they are not close to railway stations. Our bus timetable between Woking and Guildford is being reduced even further this year so that in turn means residents are going to be more reliant on their cars. For this reason, I STRONGLY OBJECT to the development proposed in the Local Plan.

Impact on local policing services
With funding being cut to police services, how will building large developments, such as Garlick’s Arch and Wisley Airfield help? Put simply, it won’t. For this reason, I STRONGLY OBJECT to the development proposed in the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Insufficient pedestrian footpaths/cycle lanes on local roads

With increased congestion which will be caused by building large sites, such as Wisley Airfield or Garlick’s Arch, this will have major ramifications for existing residents. Our footpaths are insufficient now so increasing the amount of vehicles on the roads will increase the danger to pedestrians. There are many cyclists who like to use the local roads, for which we don’t have cycle lanes. Is it worth risking human life to build such unsuitable developments? For this reason, I STRONGLY OBJECT to the development proposed in the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/549  Respondent: 15144545 / Stacey Maxwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Implications on traffic

Building as many houses as proposed will have a catastrophic effect on the A3 and local roads. The road I live on is already ridiculously busy and due to the bottleneck at the end of the road, I see a lot of aggressive driving. How will these roads cope with any more traffic? Will building more houses help with the aggressiveness? I think not. For example, the site at Wisley Airfield proposed over 2,000 houses which could mean (at the very least) an extra 4,000 cars on the road. Given Highways England has no plans to improve the A3 in the immediate future, how on earth will the surrounding villages be able to cope? For this reason, I STRONGLY OBJECT to the development proposed in the Local Plan.

1. Congestion on the local village roads

Following on from #4, the villages are already at capacity from the sheer amount of traffic we currently experience. The parking situation on the high street and surrounding roads is not sustainable. The house that I share with my partner has neither a driveway nor allocated space so we are reliant on being able to park on the road outside our house. More traffic on our roads from these proposed developments leading to a larger population would be disastrous. I STRONGLY OBJECT to further development which will do nothing to help with the current congestion or parking issues we currently face.

1. Unsuitability of our local roads for heavy vehicles and more traffic

The surrounding villages around these strategic sites by their very definition have a lot of country lanes which are very narrow and often allow for only 1 car to pass at a time. On the road I live, I often see heavy goods vehicles and other unsuitable vehicles, such as coaches, pass by which are totally unsuitable for this road. The local roads are not in an optimal condition either which would only get worse with more traffic. For these reasons, I STRONGLY OBJECT to the development proposed in the Local Plan.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9171  Respondent: 15144545 / Stacey Maxwell  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to 2016 Draft Local Guildford Plan

I object to a totally unrealistic number of houses for the country lanes to absorb.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/552  Respondent: 15144545 / Stacey Maxwell  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Impact on environment
   Destroying the Green Belt and beautiful greenery/woodlands in these historic villages around the strategic sites will have a catastrophic effect on wildlife and the environment. This is completely UNACCEPTABLE and there appears to be no consideration for issues these developments will cause the conservation areas or Special Protection Areas. For this reason, I STRONGLY OBJECT to the development proposed in the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/547  Respondent: 15144545 / Stacey Maxwell  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
I have the following objections to removing Ripley, Send and Clandon from the Green Belt:

1. **Green Belt**
   I STRONGLY OBJECT to the proposal to remove Ripley, Send and Clandon from the Green Belt. These are historic villages and there is no sound reason to do this. I bought a house in Ripley as it’s a lovely village and it’s utterly heartbreaking to see that planning departments are even contemplating removing these villages from the Green Belt. If this decision moves forward, the Green Belt will be gone forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9550  Respondent: 15144545 / Stacey Maxwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/548  Respondent: 15144545 / Stacey Maxwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **Disproportionate size of proposed development to size of villages**

I STRONGLY OBJECT to the size of the proposed developments (e.g. Wisley Airfield, Garlicks Arch on the Ripley/Send border, Gosden Hill in Clandon). These developments are totally disproportionate to the rural villages and will have a catastrophic impact on the local communities. I moved to Ripley for the very reason it’s a small village, I have no desire to see it turned into a big town.

1. **Unbalanced allocation of development in one area of the Borough**

According to the statistics, in the 5 miles between the M25 and Burpham, there is a proposal to build over 6,500 houses. This equates to over 40% of the housing proposed in the Local Plan, which is disproportionate to the rest of the Borough. This is totally unacceptable and I STRONGLY OBJECT to this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLP16/550  **Respondent:** 15144545 / Stacey Maxwell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **Impact on air and noise pollution**

Increased traffic on the road will simply mean more pollution, both air and noise. For this reason, I STRONGLY OBJECT to the development proposed in the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLP16/9401  **Respondent:** 15144545 / Stacey Maxwell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.
### Comment ID: pslp173/139  Respondent: 15144545 / Stacey Maxwell  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Ripley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. Ripley and the surrounding villages are already above the legal limit of pollution so even by contemplating these proposed and increased developments at Site A43 Garlicks Arch and Site A35 Former Wisley Airfield, to name a couple, **Guildford Borough Council is contemplating breaking the law.** This is totally unacceptable. Green spaces are actually needed to counteract the effects of pollution.

2. Ripley, Send and Clandon are rural, distinct villages. The proposal to increase the houses at Garlicks Arch to a minimum of 400 houses will ruin both the rural nature of these villages and will turn us into 1 big town. People buy properties in villages because they want the sense of community that comes with village life. If we wanted to live in a town, we’d have bought a house in one!

### What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Attached documents:**

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### Comment ID: pslp172/1530  Respondent: 15144545 / Stacey Maxwell  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

How can it be acceptable to increase the amount of houses from 45 to 60 at Site 42 Tannery Lane? This is an extremely narrow road which cannot cope with the size of this development. In turn, this will have a grave impact on the surrounding local and rural roads.

### What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Attached documents:**

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### Comment ID: pslp172/1528  Respondent: 15144545 / Stacey Maxwell  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The inclusion of 6 plots for travelling showpeople to the A43 Garlicks Arch site is frankly ludicrous in a rural environment within the Greenbelt. Our roads can’t cope with the size of the vehicles and storage facilities they will come equipped with. Why does Ripley have to have 75% of these plots? This is totally unacceptable and completely unbalanced.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. With regards to the A58 Burnt Common Site, the potential for a substantial increase in industrial floorspace from 7000 sq m to an unspecified amount is completely unacceptable. There has not been sufficient information provided to local residents and therefore takes away our rights for a proper and thorough consultation. This is underhanded. How on earth can this be acceptable, in a rural environment, to increase the amount of heavy goods vehicles that will be using our surrounding roads?

2. With regards to the A58 Burnt Common Site, there has been a brief mention of a Waste Management Facility (which has been conveniently made less prominent in policy 4.4.23a) – this must go through a formal and proper consultation. Again, this is underhanded by Guildford Borough Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing to object to the Local Plan 2016-06-18 and would like my comments to be seen by the Inspector. It would appear that far from looking after the Rate payers interests Guildford Borough Council would override our interests and previous comments and objections.

I object to the way the council have changed the plans for Send after the original plan was put forward.

I object also to the various villages being removed from the Green Belt, in particular Send Village policy P2

I object to the massive development of Garlicks Arch Burnt Common, this is another development just slipped in without the necessary consultation. The local roads in this area are already blocked during the morning and afternoon rush hour periods as they were not built to cope with this volume of traffic already using them. Apart from a major junction at Burnt Common, there does not appear to be any further plans for improvement to the roads in this area. The A3 is already grid locked to both North and South daily.

I object because no one seems to have considered how much water and sewage will be used and generated by the properties proposed for this whole area including Ripley, Send, Wisley and Clandon. Just how are these new households and businesses to be served? What about Policing, Fire and Ambulance services on top of which the Dr surgery is already struggling as is The Royal Surrey Hospital. In summery I strongly object to the 2016 Draft Plan.

I object to any invasion of The Green Belt.

I object to any in setting of any villages from the Green Belt.

I object to the massive amount of development in this one area of the Borough.

I object to the incredible limited consultation period.

I object to the last minute inclusion of new sites with less than two weeks notice.

I object to the total lack of any evidence for the alleged housing need numbers.

I object to the lack of immediate provision for new schools.

I object to the lack of creditable provision for Dr's surgeries.

I object to the proposal to build 40 homes and 2 travellers pitches on the land West of Winds Ridge and Send Hill. This site is new and was not included in the regulation 18 Draft and has not been consulted upon previously. Development for housing is inappropriate due to its narrow entrance, Green Belt status, and high quality Green belt amenity within an area of beautiful countryside which would be ruined by development. The sub soil of this existing site contains documented unsafe land fill which is currently vented and should never be disturbed as nature has sealed the site it must be left undisturbed. The proposal to include two travellers' sites is inappropriate due to the existing narrow single track lane which provides insufficient access to the site or even access to Potters Lane. In fact residents at this point are woken up in the early
hours by delivery lorries which get stuck due to wrong instructions from sat navs having to reverse back up Send Hill with warning sirens and flashing lights. There is also a school at the bottom of the hill with the attendant traffic when mothers deliver and collect their children. Policy 44-1.9na.

It is disgraceful that in spite of all the promises you made at election time, you now seem to totally disregard our views and seem intent on breaking down our village communities and destroying the community spirit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/557</th>
<th>Respondent: 15144641 / Andy Doughty</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also have grave concerns over the community should the development proceed, in particular in relation to schools, medical facilities and local roads, all of which are already under immense strain.

School places are already at a premium and any additional development would decrease availability.

I have attempted to make medical appointments recently and have only been successful on two occasions, any development may reduce that success further.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/558</th>
<th>Respondent: 15144641 / Andy Doughty</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We already see significant traffic through Ripley, Send and Clandon. During the development stage this would increase significantly and remain at much higher levels than currently experienced once completed. The proposal of Garlick’s Arch in particular would create huge increases in additional congestion.

I do not feel the development meets any needs of the local communities and only see any development of these areas as a negative move and therefore object to the proposals.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/556  Respondent: 15144641 / Andy Doughty  Agent: |
|---------------|-----------------|
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to the current proposals to develop the local area of Ripley, Send and Clandon.

I do not agree that these areas should be removed from the Greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/560  Respondent: 15144737 / L M Wells  Agent: |
|---------------|-----------------|
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a resident of Normandy for approx. 25 years we chose to live in a village, Overthose years we have observed traffic increase enormously, Our road system just about copes the ref ore to increase the number of houses by 1100 which is your proposal doubles the size of Normandy which the current road & sewage system could not cope with. Normandy elevates from South to North at quite a steep gradient causing flooding to occur regularly on the North boundary at times closing Glaziers lane for fear of stalling in deep water, sewage has been a major problem for several properties in there gardens. To propose such an enormous development is totally unacceptable & will deprive future generation of any green belt to walk in & breath air not po luted by vehicles There fore I am lodging a strong objection

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: pslp172/1862  Respondent: 15144737 / L M Wells  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the policy changes A43 at Garlicks Arch, Send Marsh because -

1. The allocation of Travel lers/Showpeople sites is already excessive and out of all proportion even with reference to Local Plan Hi.
2. There are no "exceptional" circumstances for this important green belt to be developed and it is an important contribution to the control of flooding in the area which has sometimes been widespread in recent years.
3. Excessive traffic will result in increasing congestion, pollution and potential health risks to the local area and its residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1863  Respondent: 15144737 / L M Wells  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the policy change A58 at Burnt Common London Road because -

1. The word 'maximum' is a change from "minimum" and industrial development is unsuitable.
2. Heavy vehicular traffic from such a site would create further congestion and pollution.

It is particularly disturbing that there has been little or no effort on the part of the Council to ameliorate the very legitimate concerns of local people. These concerns therefore are as relevant to the latest draft Local Plan as the earlier version of the document.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/258</th>
<th>Respondent: 15144929 / Michael Simpson</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

> I object to the local plan policy A 43.30 proposal to build so many houses in Send & Ripley area. Of course some new houses are required but Send and Ripley seem to be taking a disproportionate share of Guildford borough’s target and this feels unfair.
> 
> What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/257</th>
<th>Respondent: 15144929 / Michael Simpson</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

> > I object to the local plan policy A44.1.9 proposal to allow a travellers site anywhere in Send and especially where there is insufficient access for their larger vehicles.
> 
> What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/568</th>
<th>Respondent: 15144929 / Michael Simpson</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the local plan proposal to remove Send village from the green belt as I believe Woking and Guildford will just merge in to one bug suburb and Send will lose its identity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/567  Respondent: 15144929 / Michael Simpson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My name is Michael Simpson and I live at [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998].

I have objections to the local plan and I want the Planning Inspector to be seen by the inspector.

I object to the local plan policy P2 proposal to remove Send village from the green belt. At this rate the next generation won’t know what a village is, or what the green belt is.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18569  Respondent: 15144929 / Michael Simpson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the local plan proposal to build so many houses in Send & Ripley area on green field sites as there are still quite a few brown field sites that could be built on.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPP16/569</th>
<th>Respondent:</th>
<th>15145057 / Vincent Francois</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Regarding the above plan proposed by Guildford Borough Council (GBC)

I have several points that I wish to raise and a number of objections that I wish to be logged.

- Objection 1 (Policy 52). GBC in the 2014 consultation declared that their intention was to build 652 houses/year (between 2013-2033). Now in their most recent plan they are aiming to build 693 houses per annum. This increased number would severely impact on our already congested roads, on GP surgeries, hospitals, schools and shows complete disdain regarding preservation of Green Belt land.

- Objection 2 (Policy P2). This policy involves the creation of new boundaries to inset the villages of Send and Send Marsh/Burnt Common. Thus removing their Green Belt status Can GBC really act with impunity when their proposal breaks this government's promise to "Protect the Green Belt"? Its removal would result in urban sprawl and gridlock. The Green Belt is also there for the purpose of access to clean air and to provide a safe habitat for wildlife.

- Objection 3 (Policy A43). The proposal, referred to as Garlick's Arch to build 400 homes and 7,000 sq.m space for additional light industry and warehousing. This would lead to a 41% increase in population in the area. The proposal is that these houses are to be built on the agricultural land based just outside the Send Marsh/Burnt Common village boundary. Again, if this goes ahead it will result in filling our roads with more cars and HGVs. The arterial A3 autoroute and the surrounding roads are already operating at full capacity. Putting more vehicles on the road will result in intolerable levels of noise and unacceptable levels of pollution from nitrogen dioxide and other harmful pollutants.

- Objection 4 (Policy A43a). The addition of two more slip-roads to and from the A3 and the A247 (Oandon Road) again will result in total congestion. Send Road leading to Woking has resident's cars parked on either side of the road leaving a very narrow space for cars and vans to pass one another and in most instances one has to give way to oncoming traffic. This is also the case with Clandon Road which is narrow and winding and already operating at full capacity. These roads are dangerous to pedestrians crossing, cyclists, and for residents exiting from side roads. I can only assume GBC did not seek the advice of a road traffic consultant or they would not have arrived at such a ludicrous plan.

- Objection 5 (Policy A25). If the proposed 2,000 housing development goes ahead at Gosden Hill it will result in high visibility urban sprawl obliterating the rural nature of the area and have a massive negative affect on the A3 and local roads. Good regeneration planning requires ingenuity, empathy and the ability to adopt a holistic approach that
satisfies the need for new housing and small business development whilst taking into account the needs of the resident population, the existing infrastructure and the need to preserve as much of the Green Belt as possible. These key features are missing from the GBC proposal ...

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/2877  **Respondent:** 15145057 / Vincent Francois  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Garlick's Arch policy.

I object to the building of 400 homes and 6 Travelling Show People plots

• How would the occupancy of these plots and the flow of equipment to and from the plots be monitored

• HGVs would be required to move large equipment thus contributing to the existing traffic problems

• Building on this land would result in over development with no demarcation between villages thus defeating the purpose of the Green Belt.

• This area is subject to flooding with flood zone 2 status

• It is contaminated by lead shot arising from shooting clubs, accumulated over many years

• It contains beautiful ancient woodland, the destruction of which would be a tragedy for for the area and wild life

• The existence of high voltage pylons across this land has been ignored. These will provide a serious Health and Safety risk to occupants of the Traveler sites when they move equipment. This is Green Belt land and should remain so.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/2878  **Respondent:** 15145057 / Vincent Francois  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
New Policy A58: I object to GBC’s proposal to build 400 houses and 7,000 sq.m. employment space (light industrial/storage, warehousing) on virgin Green Belt around Send! Send Marsh/Burnt Common

- This construction would remove vast areas of Green Belt open space
- The policy seeks to increase the area of land to be extracted from the Green Belt by a minimum of 7,000 sq.m of employment floorspace. The word minimum used leaves the door open for future development
- There would be a very severe and adverse environmental impact not only on the two villages, but throughout the whole surrounding area, overdeveloping the local rural communities and creating major traffic problems.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1313  Respondent: 15145057 / Vincent Francois  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy
I object to the number of homes (12,426) to be delivered by GBC over a 20 year period

- The infrastructure is not in place to support this number of homes.
- It would put unimaginable pressure on road capacity, schools, doctors' surgeries, hospitals and police. This proposal would mean an increase in population of 41% which is total unacceptable as the existing local road systems are already unsafe and not fit for purpose
- Cycling along the narrow and winding roads or walking on the pavements is already hazardous. I do wonder is any councillor has tried walking or riding along the present roads. To widen the roads in the designated areas would mean knocking down existing homes.

Instead of spreading the load to cause minimum disruption, It would appear that GBC seems to be biased against this area as it has decided to dump -40% of its plan in one spot putting great strain on the existing facilities and residents. We are at the extreme end of the Borough and from our standpoint the councilors have decided on a solution that disrupts the minimum of its voters, overpowers and annoys its existing residents. By disregarding the numerous objections sent to GBC it is demonstrating the bullying tactics of government representatives. If this is how democracy works it stinks.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/570  Respondent: 15145089 / linda brockey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to register my opposition to the local plan re: the Horsleys.

The boundaries of our villages will be greatly enlarged. The village areas inside these boundaries will be removed from the Green Belt. The Horsleys are likely to have more than 533 new houses - we do not have the facilities or infrastructure to support this growth. Our local schools, roads and doctors are already at breaking point!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/577  Respondent: 15145121 / Irene Francois  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Regarding the above plan proposed by Guildford Borough Council (GBC) I have several points that I wish to raise and a number of objections that I wish to be logged.

• Objection 1 (Policy 52). GBC in the 2014 consultation declared that their intention was to build 652 houses/year (between 2013-2033). Now in their most recent plan they are aiming to build 693 houses per annum. This increased number would severely impact on our already congested roads, on GP surgeries, hospitals, schools and shows complete disdain regarding preservation of Green Belt land.

• Objection 2 (Policy P2). GBC policy involves the creation of new boundaries to inset the villages of Send and Send March/Burnt Common. Thus removing their Green Belt status Can GBC really act with impunity when their proposal breaks this government's promise to "Protect the Green Belt"? Its removal would result in urban sprawl and gridlock. The Green Belt is also there for the purpose of access to dean air and to provide a safe habitat for wildlife.

• Objection 3 (Policy A43). The proposal, referred to as Garlick's Arch to build 400 homes and 7,000 sq.m space for additional light industry and warehousing. This would lead to a 41% increase in population in the area. The proposal is that these houses are to be built on the agricultural land based just outside the Send March/Burnt Common village boundary. Again, if this goes ahead it will result in filling our roads with more cars and HGVs. The arterial A3 autoroute and the surrounding roads are already operating at full capacity. Putting more vehicles on the road will result in intolerable levels of noise and unacceptable levels of pollution from nitrogen dioxide and other harmful pollutants.

• Objection 4 (Policy A43a). The addition of two more slip-roads to and from the A3 and the A247 (Oandon Road) again will result in total congestion. Send Road leading to Woking has resident's cars parked on either side of the road leaving a very narrow space for cars and vans to pass one another and in most instances one has to give way to oncoming traffic. This is also the case with Clandon Road which is narrow and winding and already operating at full capacity. These roads are dangerous to pedestrians crossing, cyclists, and for residents exiting from side roads. I can only assume GBC did not seek the
advice of a road traffic consultant or they would not have arrived at such a ludicrous plan.

• Objection S (Policy A25). If the proposed 2,000 housing development goes ahead at Gosden Hill it will result in high visibility urban sprawl obliterating the rural nature of the area and have a massive negative affect on the A3 and local roads. Good regeneration planning requires ingenuity, empathy and the ability to adopt a holistic approach that satisfies the need for new housing and small business development whilst taking into account the needs of the resident population, the existing infrastructure and the need to preserve as much of the Green Belt as possible. These key features are missing from the GBC proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2712  Respondent: 15145121 / Irene Francois  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43 - Garlick's Arch - I object to GBC intending to build 400 homes on this green and agricultural land and purposely destroying ancient woodland and in the process removing wild life habitat. Plus, I object to the addition of 6 Travelling Show People plots which would result in increased parking spaces for large vehicles and storage space. If this goes ahead it will fill our roads with more cars and HGVs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2711  Respondent: 15145121 / Irene Francois  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

New policy A58 - Industrial space on land around Burnt Common, London Road. This new policy seeks to increase the area of Green Belt land to be sacrificed for additional light industry and warehousing. GBC states a minimum of 7,000 sq. m of employment floor space. The use of the word minimum rather than maximum is duly noted as it leaves the door open for further future development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: pslp171/1175  Respondent: 15145121 / Irene Francois  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S2 - The number of homes that GBC has to deliver over a nineteen years is 654 per year. This will increase the population by ~40%. The infrastructure cannot support this increase. The increased number would severely impact on our already congested roads, on GP surgeries, hospitals, schools and encroach considerably on Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/586  Respondent: 15145249 / Colin Wells  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am very concerned about the proposed changes to the A3 Junction at Burnt common. I travel along those roads on a daily basis and the proposed changes to this junction or the provision of a new large junction will simply overload the already busy roads and local services. I am concerned that these changes will lead to traffic cutting through Send and Old Woking to reach Woking centre. I object to the proposed new A3 Junction layout for those reasons.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/583  Respondent: 15145249 / Colin Wells  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I understand that a large redevelopment around the village of Send and the alteration of the existing Green Belt arrangements at Send and Burnt Common are being proposed in the Local Draft Plan.

I wish to strongly object to the changes to the Green Belt that would remove areas around the village of Send from the designation of ‘Green Belt’. The whole idea of having a green belt is to permanently protect rural areas from development and to prevent towns and cities expanding into agricultural land and areas of natural beauty. There is a real danger that this leads to the joining together several villages to form a sprawling area that in turn joins to Guildford or Woking ( or both ).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/585  Respondent: 15145249 / Colin Wells  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also wish to object to the redevelopment of existing farmland at Garlick’s Arch to provide large numbers of housing and industrial units into an area where it is not required nor will it be necessary for many years to come. There are ample sites within the boundary of Woking that can provide these opportunities and I believe that brownfield sites should be used before developing more fields.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/219  Respondent: 15145249 / Colin Wells  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I have to say that I am very disappointed that the Local Authority has only allowed such a short period for discussion and either support or objection.

I urge the local authority to cancel these proposals and to follow the proper procedures that are laid down for the protection of our countryside.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/589  **Respondent:** 15145313 / T G Wells  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to these proposals because I cannot believe that sufficient weight has been given to recent historical flooding in these areas resulting in ingress to properties.

We are told by experts to expect climate change to bring more extreme episodes of weather and yet you are proposing to concrete over large tracts of useful Green Belt allowing more water to be delivered more swiftly to streams and rivers, with resulting overflows and flooding.

I object to these proposals because I believe Government Policy is that 'proven need' is required to take land out of the Green Belt. I do not believe that this 'proven need' has been achieved, and these proposals constitute over development on a grand scale.

I object to these proposals because I do not believe sufficient consideration has been given to resulting traffic flows and consequential pollution of the atmosphere with gridlocked heavy goods vehicles, apart from the general chaos at busy times.

Please note that I wish my comments to be seen by the Inspector.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp172/2090  **Respondent:** 15145313 / T G Wells  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the policy changes A43 at Garlicks Arch, Send Marsh because -
1. The allocation of Travellers/Showpeople sites is already excessive and out of all proportion even with reference to Local Plan Hi.
2. There are no "exceptional" circumstances for this important green belt to be developed and it is an important contribution to the control of flooding in the area which has sometimes been widespread in recent years.
3. Excessive traffic will result in increasing congestion, pollution and potential health risks to the local area and its residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: pslp172/2091</th>
<th>Respondent: 15145313 / T G Wells</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
</tbody>
</table>

I OBJECT to the policy change A58 at Burnt Common London Road because -
1. The word 'maximum' is a change from "minimum" and industrial development is unsuitable.
2. Heavy vehicular traffic from such a site would create further congestion and pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPA16/4172</th>
<th>Respondent: 15145377 / WYG (S Fidgett)</th>
<th>Agent:</th>
</tr>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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EXECUTIVE SUMMARY

This Planning Statement forms part of representations into the Guildford Borough Submission Local Plan: Strategy and Sites Consultation June 2016. The submission is made on behalf of the Earl of Onslow and the Trustees of the Clandon Estate.

The representations seek the allocation of land known as Onslow Park, south of the Epsom Road, Guildford for a sustainable housing led, mixed use development in order to help meet the needs of the Borough for new homes, jobs, community facilities and recreation space within the early part of the Local Plan period up to 2013-2033.
The most exciting element of this proposal is that should a resident choose to, they can go from school, through work and into retirement without ever having to use or own a car. The pedestrian, cycle, bus and train links take the resident to the greatest Capital City in the world the historic and picturesque town of Guildford whilst being able to play sport and walk in the countryside of the North Downs and AONB...and here is why.

**Vision**

The form of the development proposed is that of a sustainable urban extension on the eastern edge of Guildford, adjoining Merrow and follows the principles of a garden village.

In so doing, the proposals aim to provide a clear vision for a balanced, integrated and successful community with a long term commitment its development and maintenance and with a strong sense of its identity and place that is firmly rooted in the history of Guildford.

The key principles on which this vision are based include:

- Providing a community that is firmly based on the built, natural and cultural heritage of the Borough as a foundation for design and community development;
- A long term commitment by the Earl of Onslow and Trustees of the Clandon Estate to the management and maintenance of Onslow Park, the facilities and environment in conjunction with the community;
- Returning value to the community by investing in the infrastructure that supports the development including parkland, sports and recreation, education and housing and in the future management of Onslow Park;
- Involving the community and wider stakeholders in the planning, design and development of the site and the ongoing management of the community park and other shared spaces;
- A high quality of inclusive housing design, for people of all abilities, based on modern, low carbon construction standards, reflecting the use of local styles and materials but adopting designs appropriate to the site and its identity.
- Each of the homes will have access to its own amenity space and shared public open space as part of the community park and other facilities;
- A village community comprised of a series of walkable neighborhoods based around a traditional village green and cricket pitch, with parkland radiating from the centre to connect the existing town and new community with the surrounding countryside;
- An enhanced environment that adds to nature conservation habitats within and around the site and respects its setting, providing a variety of meadows and nature conservation areas, community parkland, sports, recreation and healthy living spaces;
- A community well connected to Guildford and part of the wider community within Guildford, well served and with new connections on foot or cycle and by a variety of modes of public transport. The proposals minimize the need to travel and optimize opportunities for connections and integration with the surrounding area.

The proposals are for a balanced, mixed use community comprising:

A mix of Housing: The masterplan provides for up to 1000 new homes, including family homes, starter homes, discounted private rented and affordable housing, retirement housing and assisted living.

A neighbourhood square: A flexible and attractive social space as a focus for activity, gathering, and holding community events, framed by the local centre and opening out onto the main recreational space.

Village centre: A village centre with potential new medical centre and pharmacy, a small convenience store and café with small scale offices above suitable for small business and start-up space.

An education campus: The provision of land for a new education campus on a 9ha site, providing a new 5 form entry secondary school and 2 form entry primary school for the east of Guildford. Based on the standards used by Surrey County Council and their requirements for the area, this aims to serve the wider community within Guildford and provide a through education opportunity with full supporting facilities and strong cycle and pedestrian links to other primary schools in the area, including the new primary school planned for the Gosden Hill development.
Employment opportunities: As part of a balanced community that provides employment, homes and services, the masterplan includes employment space in the form of a range of small scale offices within the local centre and separate office buildings, with a hotel and supporting services.

Sports and recreation: The proposals include a range of new leisure and sports facilities to serve the Guildford area. These include:

- A new Tennis Academy based around Merrow Tennis Club, with an academy building clay courts, indoor courts and an additional outdoor court.
- A new Cricket clubhouse and cricket pitch at the heart of the open space and the community hub,
- Football and sports pitches shared with the new education campus
- A new park totalling over 24ha
- New informal sports and recreation facilities including recreational routes with seating areas and a ‘trim trail’ with outdoor gym equipment, children’s play-space, Suitable Alternative Natural Greenspace (SANGs), wild areas and recreational routes to the Surrey Hills AONB
- New nature conservation areas to enhance the range of habitats and species within the site
- New woodland and hedgerow planting based around the existing features within the site, to enhance the long term landscape setting.

Sustainable transport

The site is sustainably located and accessible from within the urban area, with good access by foot, cycle and bus to the town centre and other destinations. The proposals seek to enhance this further in a number of ways.

New connections to existing footpaths and links to the centre of Merrow, with pedestrian and cycle routes throughout the development and an enhanced footpath and cycle link to the proposed Merrow Station.

The enlargement of the current Park and Ride facility, increasing the current capacity of the facility and adding the potential for cycle hire facilities to diversify the options for onward travel.

Connections to rights of way linking to the Downs and Newlands Corner to enhance access to recreational routes and the countryside from Guildford.

Sustainable Development

Government policy requires planning decision to pursue the most sustainable options for growth in order to meet the needs of the community in the most sustainable manner, that reduces the need to travel, maximises the use of alternative means of transport and maximises access to the benefits of growth to the optimum number of people.

Onslow Park forms part of the most sustainable spatial development strategy for Guildford. The site was identified in the Council’s Countryside and Green Belt Study, forming part of the evidence base for the Local Plan, as one of the preferred options for Green Belt release.

The site constitutes a well contained land parcel which is strongly defensible on all boundaries, meaning the site’s controlled release would not encourage urban sprawl. In this way, the allocation of the site at Onslow Park would not jeopardise the wider purposes or functionality of the Green Belt.

The benefits that can be delivered for the Borough through the sustainable spatial strategy proposed as part of Onslow Park cannot be matched in less sustainable locations away from the town that do not provide benefits to the existing community or help support investment in enhanced services and infrastructure within the town.

It is also one of the most sustainable locations for growth, well related to the principal town within the Borough and accessible to the majority of the Borough’s population and core services and facilities. It is readily accessible by foot, cycle and public transport and contains one the towns existing park and ride facilities, which is proposed to be doubled in size as part of these proposals.
The site is also well related to the proposed new station at Guildford East (Merrow) and the present station at West Clandon.

Onslow Park compliments the proposed allocation of land at Gosden Hill and Blackwell Farm and where relevant and necessary, would help support the infrastructure required to serve the needs of the town.

The Site has been previously inaccurately assessed in the Green Belt and Countryside Study which although it recommended the possible removal of the site from the Green Belt and its allocation as a sustainable urban extension, also failed to appreciate (inter alia) that the proposed development area of Onslow Park falls entirely outside the AONB, has no significant impact the setting of historic towns and in addition, presented an inaccurate measurement of distances to the local facilities. We consider that if these assumptions or errors had not been made, then Onslow Park is likely to have been identified as a preferred, sustainable location for growth.

Onslow Park would deliver sustainable development through:

Economy: the provision of significant scale of new mixed use development within the early years of the Plan, supporting economic activity, with housing, employment space, a hotel and additional facilities supporting the growth and development of the economic base of Guildford.

Environment: the enhancement of the landscape and natural habitats within and around the site, the adoption of low carbon, sustainable construction, the development of high quality homes zones and healthy living spaces that combine, sport, recreation and natural areas within and surrounding the community.

Social Infrastructure: the provision of a wide range of social infrastructure in the form of affordable and private rented homes as well as starter homes, recreational facilities, enhanced access to the countryside and North Downs, schools, a sporting hub with tennis, cricket, football and multi-use pitches, enhanced park and ride, medical and other facilities delivered hand in hand with the development of housing as part of a sustainable community that enhances facilities for the existing population.

Delivery

Housing and the supporting community and environmental infrastructure proposed at Onslow Park can be delivered in tandem within the first part of the Local Plan period, when the need for housing is greatest.

The site is not subject to major infrastructure or other constraints that would delay or prevent an early contribution to supply. The land is available and is not subject to any overriding constraints. Off-site transport improvements can be delivered in conjunction with the development proposed.

Housing supply within the proposed Local Plan is below the level required for the first 15 years of the Plan, due to the time needed in bringing several of the strategic sites forward. Hence there is a need, in order to meet the housing needs of the community, to increase supply early in the Plan period. This is precisely when Onslow Park can make a significant contribution, helping meet the required housing numbers in the early years of the plan.

1.0 INTRODUCTION

This document forms a written Planning Submission to the Guildford Borough Proposed Submission Local Plan: Strategy and Sites consultation July 2016. It has been prepared by WYG on behalf of The Earl of Onslow and The Trustees of The Clandon Estate. It outlines their vision for the creation of Onslow Park, a proposed ‘garden village’ adjoining the urban area of Guildford and forming a sustainable urban extension east of Merrow.

The Onslow family have had a long, extensive and positive association with Guildford, both as custodians of Clandon Park and other land within the Borough and as part of the local community and history of the town. The land for Stoke Park, Guildford Cathedral and Onslow Village, now a thriving conservation area in the heart of Guildford, were all legacies of the Onslow Estate and are now key assets in the history and fabric of the town.

Reflecting his long term commitment to the community and to Guildford, these proposals, by the Earl of Onslow, are a response to the current Local Plan debate over the best way to accommodate the housing, employment, community and the
other needs of the town and the Borough’s residents. They represent one option, we believe the most sustainable option,
which might be considered for the development of Guildford.

The purpose of this document is to outline these proposals and to provide both context and evidence that justify the
proposals and demonstrate the sustainable nature of the proposals and how they accord with the fundamental principles of
the Proposed Submission Local Plan (the Local Plan) and the National Planning Policy Framework (NPPF). The
representations are, by necessity, expressed as an objection to the Submission Local Plan and the omission of the Onslow
Park site.

The representations are accompanied by:

‘A Vision for Onslow Park’ produced in April 2016 which provides some of the background to the design and
masterplanning of the proposed development;

A Preliminary Landscape Visual Appraisal which considers the potential for Landscape and Visual impacts as a result of
the proposed development;

A set of Zone of Theoretical Visibility sector graphics, which show where development of nine metres high across the
proposed Onslow Park would be visible from a height of two metres within the surrounding area (before any landscaping
mitigation is considered for the site) (importantly the proposed development would hardly be visible from the conservation
area);

‘Onslow Park Transport Feasibility Report’ July 2016 which considers the transport issues arising from the proposed
development and shows how this accords with the transport policies proposed in the Local Plan.

This Submission provides evidence over the:

• the nature of the representations and development proposed;
• the deliverability of the development and its ability to contribute to supply in the first 5 years of the Local Plan;
• suitability of the site for the development proposed; and
• justification that demonstrates why the site should be allocated within the Local Plan in order to meet the
requirement to achieve sustainable development.

This submission also considers the need for housing and employment by reviewing the evidence base on which the DLP
has been produced.

Finally, comments are made on some of the wider strategy based policies and the impact that these may have on
deliverability in providing for the needs identified by the Council.

2.0 REPRESENTATIONS

The approach taken in the Submission Local Plan is generally supported, our comments set out within this section relate to
those areas of the Local Plan where it is considered that its strategy or policies could be improved and do not currently meet
the needs of the Borough, enhance the lives of the community or deliver development that is sustainable.

The basis of these representations is essentially that:

• The spatial strategy of the Local Plan should state clearly that Guildford is the primary town within the Borough
and is the most sustainable location for growth both within and adjoining the urban area;
• It offers the best opportunity to for development to support the vitality of the town and provides good access to
its existing range of goods and services, employment, community and cultural uses for the new housing
proposed in the Plan;
• It also maximizes the benefit for the existing community arising from additional investment in housing,
employment, recreation, transport infrastructure and new community facilities by locating these where they
benefit the most people;
• This is also the location where the opportunities to minimize the need to travel are greatest and where
opportunities to access modes of transport other than the car are maximized;
• While brownfield opportunities are to be maximized, there is also a need to consider sustainable urban extensions as the next most sustainable option for meeting the identified housing, employment and other needs;
• This option is preferable in both policy and practical terms, to less sustainable locations that are remote from the urban area and are by definition, more restricted in terms of access to the full range of goods, services and transport options than Guildford itself provides.
• The location of development, integrating the urban area with the countryside in the form of a sustainable garden village, helps provide the most appropriate basis for a new sense of community and a sense of place that respects and enhances its environment.

These representations therefore, propose the allocation of land at Onslow Park, south of the Epsom Road, Guildford to form a new garden village forming a sustainable urban extension adjoining the east of Merrow. This would provide for a new allocation policy, A58:

<table>
<thead>
<tr>
<th>POLICY A58</th>
<th>Onslow Park, Epsom Road, Guildford</th>
<th>Allocation</th>
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<tbody>
<tr>
<td></td>
<td>This is a residential lead mixed use development, allocated for:</td>
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<td></td>
<td>Approximately 1000 homes, including some specialist housing in the form of retirement village or extra-care housing, starter homes and self-build plots; and</td>
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<td>4 traveller pitches; and</td>
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<td></td>
<td>A five Form Entry (FE) secondary school (approximately 800 pupils, based on approximately 160 pupils per academic year group) with shared sporting facilities suitable for football and a range of sports and local groups;</td>
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<td></td>
<td>A 2FE primary school (approximately 450 pupils, based on approximately 65 pupils per academic year group);</td>
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<td>Approximately 2,100sqm of office and employment space and a hotel serving the needs of business and the wider community;</td>
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<td></td>
<td>A new medical centre, pharmacy and small convenience store (approximately 500sqm);</td>
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<tr>
<td></td>
<td>A tennis academy with café and changing facilities (10 courts);</td>
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<td></td>
<td>A new cricket clubhouse and pitch, enhancing existing cricket facilities on the Site; and</td>
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<td>Approximately 24ha of recreational parks, play and sporting facilities, informal open space and Suitable Alternative Natural Green Space (SANGs).</td>
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<tr>
<td></td>
<td>Recreational routes linking Merrow, Clandon and the North Downs.</td>
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<td>Access to the A25 Epsom Road</td>
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<td>A doubling in the capacity of the existing park and ride facility and introduction of cycle hire facilities and vehicle charging points.</td>
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<tr>
<td></td>
<td>Off site cycle and pedestrian improvements to the proposed Guildford East (Merrow) Station and linking with existing routes within Guildford.</td>
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</table>
### Requirements

<table>
<thead>
<tr>
<th><strong>Infrastructure</strong></th>
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</thead>
<tbody>
<tr>
<td>Primary vehicle access will be via the existing roundabout serving the park and ride on the A25 Epsom Road;</td>
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<tr>
<td>A secondary left in and left out access for emergency purposes to the east or west of the existing access onto the A25;</td>
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<tr>
<td>An expansion in park and ride facilities (currently 335 spaces) to provide up to 670 spaces</td>
</tr>
<tr>
<td>The necessary supporting infrastructure to be provided on site including the primary school with early years provision and if not provided at Gosden Hill, the secondary school, public open space and associated recreation facilities. This may also include a medical centre/GP surgery.</td>
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<tr>
<td>Recreation space including formal playground facilities, informal recreation and allotment space.</td>
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<tr>
<td>Bespoke SANG to mitigate the impacts of part of the site on the SPA</td>
</tr>
<tr>
<td>Green links to the adjoining North Downs and countryside</td>
</tr>
<tr>
<td>Where necessary to mitigate the impact of the development a proportionate contribution to off site transport infrastructure.</td>
</tr>
<tr>
<td>Maintenance of a green buffer on the Epsom Road A25 boundary and sensitive design to ensure maintenance of the transition from urban to greenfield.</td>
</tr>
</tbody>
</table>

The site is identified in Figure 1 and the overall masterplan of the development proposed is set out in the accompanying Onslow Park Vision document. The proposed development is explained in further detail in the remainder of this statement.

The site is currently occupied by Clandon Golf, the Merrow Park and Ride facility and Merrow Cricket Club. The land was extensively remodelled to form the golf course in recent years and there is permission for a new club house complex. The golf club is one of many in the area and would not limit such opportunities if it were to become Onslow Park.

The site is surrounded by extensive woodland to the east and south and the urban edge to the west, thus limiting longer range views and providing a strong sense of visual enclosure.

A good vehicular access is provided via the existing roundabout on the northern boundary of the site, on the A25.

### Garden Village

The proposed garden village comprises approximately 59 hectares of land, around half of which is proposed as parkland, public open space, sports and recreation facilities, allotments and nature conservation areas and meadows. The proposals are based upon a number of core principles:

- Providing a strong and clear vision that helps to shape a clear sense of place and community
- A long term commitment by the Earl of Onslow and Trustees of the Clandon Estate to the management and maintenance of Onslow Park, the facilities and environment
- Returning value to the community by investing in the infrastructure that supports the development including parkland, sports and recreation, education and housing and in the future management of Onslow Park;
- Involving the community and wider stakeholders in the planning, design and development of the site and the ongoing management of the community park and other shared spaces;
- A high quality of inclusive housing design, to modern, low carbon standards with a strong sense of place, reflecting the use of local styles and materials but adopting designs appropriate to the site and its identity. Each of
the homes will have access to its own amenity space and shared public open space as part of the community park and other common facilities;

• A village community comprised of a series of walkable neighbourhoods based around a traditional village green and cricket pitch, with parkland radiating from the centre to connect the existing town and new community with the surrounding countryside;

• An enhanced environment that adds to the nature conservation habitats within the site and respects its setting, providing a variety of meadows and nature conservation areas, community parkland, sports, recreation and healthy living spaces;

• A community well connected to Guildford and well served on foot or cycle and by a variety of modes of public transport. It minimizes the need to travel and optimizes the opportunities for connections and integration with the surrounding area.

The essence of the proposals is a wish to create a real sense of place, of pride and a sense of belonging that enhances the lives of the existing and proposed community by providing a range and quality of homes and open spaces, community and sporting facilities and employment opportunities that benefits current and future residents alike.

Housing

The proposed housing would include approximately 1000 high quality new homes with a vibrant mix to meet the needs of a balanced community. This would include:

• A mix of 1, 2, 3 and 4 bed family homes
• A mix of private and affordable housing with affordable homes contributing over 40% of the total, including starter homes
• A significant proportion of private rented sector housing (PRS) including the potential for discounted market rent
• Retirement housing and care village providing on site care and progressive support to suit individual circumstances
• A proportion of self-build plots
• 4 serviced travelers’ pitches

One of the aims of the proposed garden village is to provide a high proportion of privately rented homes, some of which will be offered at discounted market rents of around 70-80% of market values. This will help provide good quality homes and an alternative market tenure that is of particular value in supporting a vibrant and mobile workforce, essential in supporting the needs of the economy.

The masterplan provides an illustrative layout which demonstrates the high quality of environment proposed which presents a series of home zones each with its own character and which together form part of a cohesive garden village.

Community Tennis Academy

The tennis academy is proposed in conjunction with Merrow Lawn Tennis Club (MLTC) who wish to create a new Guildford Community Tennis Academy. The aim would be to provide a community tennis academy comprising outdoor and indoor courts, a clubhouse to provide café offer to tennis players and local residents with changing room facilities.

It would provide a performance tennis academy, adjacent to the existing tennis club facilities for aspiring local players, supported by existing world class coaches. The academy would be linked to MLTC, with the aim of being endorsed by Lawn Tennis Association and managed on a commercial basis. The academy would provide a professional tennis centre standard of operation, with community access and links with local schools and community groups and with scholarships for talented athletes.

The design would be sensitive to its setting as part of the sporting and community hub within the overall development and in keeping with the environment. There would be a combination of indoor and outdoor courts to allow extended playing time throughout the year. Guildford has no dedicated indoor tennis courts currently and hence this is a direct response to an unmet need for tennis in the Guildford area.

Access would be gained via the main site access and community centre adjacent to the park and ride.
Cricket

The Cricket facilities would include a replacement to the existing cricket pitch that is of an enhanced size and built to a standard suitable for competition level to match Merrow Cricket Club’s aspirations and support their fixtures in both the Surrey County and Fullers Leagues as well as providing for training and colts sides. The club have a thriving membership and active youth and community association. The proposed facilities would benefit from a new clubhouse with changing and kitchen/refreshment facilities and supported by external nets facilities for coaching and practice.

The cricket facilities would be at the heart of the community park, open space and informal parkland that stretches throughout the development proposed. It would be a key link in the sporting hub that encourages sporting excellence and maximum participation in the community. It links the tennis academy to the west with the village centre, open space and sports pitches and educational campus to the east. It would provide a focus for community activity and would be accessed from the main site access at the park and ride and with additional parking adjacent to the village centre.

Community Park and Public Open Space

The masterplan proposes a total of approximately 24 hectares of green space, comprising a mix of formal and informal recreation, sporting and nature conservation areas. The proposed facilities include:

- A community park which encompasses the site and runs through its heart, providing a high quality setting for the village, softening and screening the relationship with the existing eastern edge of Merrow and providing a pivotal connection within the development and linking with the adjoining countryside;
- Formal sports provision in the community tennis academy, the cricket pitch and village green, formal football and sports pitches, school playing fields, allotments, sports and recreation trail, footpaths, cycleways and bridleways;
- Informal nature conservation including wildflower meadow, retention and management of the existing the Site of Nature Conservation Importance, new hedgerow and woodland planting;
- Children’s play space based on encouraging interaction with the natural environment.

The proposed facilities meet or exceed the relevant standards for residential development and are a fundamental part of creating the sense of place that underpins the garden village vision.

Employment and Hotel

The proposals for Onslow Park include a new business hub, as part of a sustainable mixed use development, based around a series of office buildings on the eastern side of the village centre. This links the park and ride with the proposed education campus and helps to cement the connection between enterprise and learning. Approximately 2,100sqm of modern office space is proposed in a series of office buildings, suitable for flexible, high quality business space, including accommodation suitable for starter and incubator units.

The proposed Education Campus comprises both a primary school with early years provision and a secondary school, that meets the needs of the development and the wider area.

It is acknowledged that there is a secondary school site now proposed within the Gosden Hill allocation. The proposed secondary school at Onslow Park is an alternative site for the proposed school and one that is less constrained. The aim of locating the school within Onslow Park is to provide a clear connection with the sporting hub that is formed by the combination of formal sports pitches, the cricket and tennis academy, which together provide unrivalled facilities for both the school, local clubs and the community. The integration of sporting and educational aspirations is part of the key successful sports and a healthy environment for education.

Alongside the proposed office space, it is proposed to locate a hotel to support the business and wider needs of the area. This includes meeting and conference space and will help support the wider visitor and tourism strategy for the Borough.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4173  Respondent: 15145377 / WYG (S Fidgett)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OAN Update

The evidence base has an identified OAN of 693 dwellings per annum following the conclusions of the West Surrey Strategic Housing Market Assessment (SHMA) produced in September 2015 by GL Hearn. This assessment was carried out as part of the Housing Market Area (HMA) known as West Surrey which included Waverley and Woking in addition to Guildford.

The most recent population projections produced by Office of National Statistics (ONS) shows that by 2037, the population of Surrey is expected to increase by over 200,000. This increase is anticipated to be greater than shown by the 2012 population figures. The 2012 figures informed the SHMA which in turn has provided the basis around which the housing requirement for the new Local Plan is formed. It can be expected that a large proportion of this increase will be in the West Surrey HMA due to its proximity to London, strong rail connections and reputation as being part of the commuter belt and a desirable place to live.

It may be necessary therefore, to consider whether the SHMA should be revised upwards taking into account the increases based on the 2014 projections and whether the housing requirements in the Local Plan should also be revised upwards. It would suggest that the identification of other sites for development should be considered as part of this process, in conjunction with the consideration of the suitability and sustainability of the sites proposed.

5 Year Housing Land Supply

Paragraph 47 of the NPPF states that there is a requirement for Local Planning Authorities (LPA) to:

“Identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements with an additional buffer of 5%...where there has been a record of persistent under-delivery of housing, LPA's should increase the buffer to 20%”.

It has been established that Guildford cannot demonstrate a five year supply of deliverable housing land with the benefit of planning permission. Current Council estimates are at best a 2.5 years supply. It has not been able to do so for a number of years and hence the buffer adopted should equate to 20%.

It is therefore clear that without significantly more available land, Guildford cannot expect to be able to show a five year supply in the short term, nor on the basis of the trajectory for the period up to 2022/23.

Green Belt
It is acknowledged that the Local Plan is looking to make difficult decisions regarding the allocation of future development based on a balanced judgment of the need to meet OAN whilst also preserving and protecting the Borough’s natural environment, including the Green Belt.

The evidence base produced by the Council clearly indicates that there is limited capacity in the urban areas of the Borough to meet objectively assessed need (economic or social). Therefore, the Green Belt and ‘Countryside Beyond the Green Belt’ requires review and some release in order to provide capacity to accommodate future growth if the unacceptable effects of a continued failure to meeting housing employment needs are to be minimised. Continued failure to address the issue removes the ability of many to afford or have access to good quality housing, imposes social costs, prices younger people out of the area in particular and has negative consequences for growth and the economy and vitality of the area.

Broadly the Council has sought to evenly distribute development (economic, social and housing) throughout the northern, eastern and western parts of the Borough rather than adopting a sustainable spatial strategy.

It is clear from both the Local Plan and the evidence base that accompanies it, that the Council acknowledge that new sites, including those in Green Belt and Countryside locations, are required in order to adequately plan to meet need. We concur with this view.

Green Belt and Countryside allocations have been made, in part, on the basis of assessments made in the Green Belt and Countryside Study (GBCS). This study sought to review all areas of the Green Belt and Countryside in the Borough and assessed them against the five purposes of the Green Belt and their overall sustainability credentials.

We are generally supportive of the approach taken in this regard, but believe there are some inaccuracies and errors in the methodology applied, which have resulted in some sites being inaccurately assessed and / or over looked, including Onslow Park.

In terms of environmental considerations it is considered that the extent of Green Belt land within the Borough is clearly a constraint to meeting its development requirements and that if the Borough is to plan successfully for a sustainable future, elements of the Green Belt will need to be reviewed and released.

It is also relevant that the majority of the Borough is located within the Green Belt and that other designations, such as AONB, SSSI, SPA and SAC heathland further constrain its ability to meet the needs of the population. These are together part of the high quality environment that is essential in the character and quality of the Borough.

The Green Belt was designated following Acts of Parliament in 1939 and 1944 and at that time there was no ability to predict how the population would grow. Therefore, whilst the principles of the Green Belt should clearly be upheld and its extent defined, in order to plan properly for the long term, the review of Green Belt boundaries is something that is required from time to time in order to meet the needs of the area.

Realism is required that in this case, population growth has surpassed expectations and that the Country, Counties and Borough’s need to provide satisfactory levels of housing and employment opportunities for its population. ‘No change’ is not a viable option and would lead to increasingly serious socio-economic problems for the area.

The proposed releases of land from the Green Belt also need to be placed in context. Approximately 89% (24,000ha) of the Borough is currently Green Belt, and the majority of this can be retained as such. Only a relatively small amount of land release is required to meet objectively assessed need and this should not be viewed as a weakness; rather it should be viewed as an opportunity to address a long standing issue in the Borough enabling a future whereby the most valued / important environmental strengths and green infrastructure of the Borough are protected, whilst also facilitating sustainable development that meets the social, environmental and economic needs of its population in areas which are not so valued / important.

The review of Green Belt and the provision of sufficient land for development in the Plan period, enhances the level of protection afforded to the rest of the Borough including both Green Belt and Countryside Beyond the Green Belt. This will also enable the creation of a better balanced environment that recognizes the quality of the countryside whilst also providing for the Borough’s growing population.
The Green Belt review that is signaled in this Local Plan represents a significant opportunity for the Borough which should be embraced. The need to positively plan for Guildford’s future, to help meet its needs and maintain a sustainable and balanced community within a high quality environment is what the Local Plan is about.

The Green Belt and Countryside Study, (GBCS), February 2013 (Updated) is an evidence based document that has sought to provide a borough-wide assessment of the Green Belt and Countryside, assessing various sites and locations against the purposes of the Green Belt, which in turn enabled potential areas suitable for development to be identified.

4.56 The NPPF itself states that “when reviewing Green Belt boundaries we should take account of the need to promote sustainable patterns of development”. As such one of the components of the original study was to consider the most sustainable patterns of development, hence concentrating on the area around Guildford.

4.57 Volume 1 of the Green Belt and Countryside Study identified the site of Onslow Park as parcel E1. It was considered as being capable of release without compromising the purposes of the Green Belt. It commented in its summary at para 1.16:

“Land parcels C1, C2 and E1 provide opportunities to accommodate appropriate development without significantly compromising the purposes of the Green Belt. PDAs have been identified to the east of Burpham and Merrow, enclosed by the A3, Frithy’s Wood and residential properties on Merrow Lane (C2); contained by Cotts Wood, the railway line and Merrow Common (C1); and continuous with residential properties following Abbot’s Way and Trodd’s Lane near Merrow Downs, within the newly constructed golf course (E1). The PDAs are generally enclosed by woodland and hedgerow treecover, rising topography, principal highways and railway infrastructure. Land parcels C1 and C2 are located directly to the west of Frithy’s and Cott’s Wood Site of Nature Conservation Importance (SNCI). Land parcel C1 is located to the north of Registered Common Land at Merrow Common and to the north west of Clandon Park Registered Park and Gardens. Land parcel E1 is partly located within the Surrey Hills AONB, directly to the north of Merrow Downs Registered Common Land, and to the south of Clandon Park Registered Park and Gardens. Any development within Land parcel E1 would therefore need to carefully consider the landscape and visual effects on the Surrey Hills AONB, and development within this designation should only be brought forward if no other suitable areas outside the AONB can be developed.”

4.58 Although it referenced the AONB as the main constraint in relation to parcel E1 it should be noted that this originally defined parcel boundary extends significantly beyond the area of Onslow Park, which excludes all of the land within the AONB and occupies only that open ground outside the AONB occupied by the recently man made landform of the golf course.

4.59 Hence there is no basis for its exclusion and if it had been assessed on that basis, it would have been identified in a similar manner, alongside Gosden Hill as a sustainable location for growth. The Study commented that these parcels made the least contribution to Green Belt purposes:

“For clarification, the above 20 land parcels were identified for the sustainability assessment within Stage 3 due to them contributing least to the purposes of the Green Belt (scoring 0-2 points) within Stage 2.

4.60 The Study in Volume II concluded:

“Guildford (East): Land Parcel E1, Land at Epsom Road. Land parcel E1 located within the newly constructed golf course and near the Park and Ride on the Epsom Road to the east of Merrow (Guildford, East) provides opportunities for development (1013 residential dwellings) without significantly compromising the purposes of the Green Belt (Score 1). The land parcel would appear continuous with residential properties following Abbot’s Way and Trodd’s Lane near Merrow Downs. The land parcel is partly located within the Surrey Hills AONB and to the north of the AGLV, Merrow Downs Registered Common Land and an SNCI. Clandon Park Registered Park and Gardens is located to the north of the land parcel. Moderate treecover to the east and south contains the land parcel, whilst much of the area remains unconstrained in environmental capacity terms. The Green Belt boundary could be realigned to exclude the newly constructed golf course area bordered by treecover on Merrow Downs and the A25. Land parcel E1 scored 5.57 and was ranked 19th according to current sustainability credentials.”

4.61 The parcel was recommended for release and the proposed new green belt boundary was identified in the Study illustration reproduced below: <see attachments>
However, notwithstanding this, the sustainability appraisal significantly understated the sustainability of the site. This is due to the fact that the appraisal (see para 7.18 of Volume II) measured distances from the centre of the parcel to the relevant facility being considered. These are identified on the plans in Volume IV and it can be seen that parcel E1 was significantly bigger than identified above and extends further south. In the case of parcel E1, the distance was effectively measured from a point significantly further south of the centre of the currently proposed site (or the site identified above) and outside its southern boundary. Hence the actual score is significantly better than predicted for the enlarged parcel considered. An example of this is shown below: <see attachments>

The resulting spatial rationale for the proposed potential releases from the Green Belt were summarised within the Study in Volume 1 (App II) and extract is shown below from the updated Addendum to Volume II App 8 (the revised Potential Development Areas), which clearly shows the rationale for the proposed site E1, Onslow Park, as a sustainable urban extension on a key route into Guildford, well located on the east of the town, complimenting Gosden Hill (C1 and C2) and Blackwell Farm (H1 and H2).

**Employment Land Assessment**

At the current time, one of the most significant weaknesses of the Borough is that housing supply is not meeting the local economy’s needs or demand for people (staff) and that a significant amount of the Borough’s population out commute to work. Recruitment within the Borough suffers as a result.

In addition to this there is a lack of suitable commercial land and the Borough’s existing employment stock is not meeting the needs of local business. This is identified within the evidence base for the Plan.

Therefore, key to improving employment opportunities is ensuring that the correct mix and supply of employment accommodation is available in the Borough to meet with needs. This would help to reduce out commuting, improve sustainability and if balanced with an adequate supply of housing will ensure that the local economy remains strong and becomes more self-sufficient.

The Employment Land Assessment (ELA) undertaken by the Council sought to assess how much employment land is likely to be needed within the Borough in the Plan period. It concludes that there is not enough employment land to meet future growth needs, a conclusion which we agree with. We would question however, the amount of employment land that is required to meet need, which we consider to be underestimated.

The ELA estimates that the Local Plan should look to provide an additional 10.5-20ha of ‘B’ use class floorspace to meet objectively assessed need. It then goes on to state that currently the Borough has the potential to deliver 7.4ha from existing urban and settlement locations, which is not enough to meet need. To put this in context 20ha of land would only equate to 1.27ha per annum over the plan period.

In this regard the conclusions of the Local Business Survey are helpful as this states that more than 50% of the firms which responded to this survey expected their floor space requirements to increase over the next 10 years, with 66% stating that they would not be able to expand at their current location.

We also feel that the ELA has artificially reduced the requirement for additional employment floorspace. This is odd considering that there has been no notable commercial development since 2008, yet industries within the Borough are growing. For example Allianz Insurance has grown from 700 to over 1,100 employees in the last few years and it is clear that other companies would like to grow if floor space allowed (based on the findings of the Local Business Survey highlighted above). This artificial reduction is compounded by the assumption that working from home will increase, which is likely to be the case, yet demand for B1(a) accommodation remains a constant and supply is diminishing with the loss of offices to residential use, and homeworking for B2, B8 and B1(c) industries is not practical. Therefore, this conclusion seems rather unrealistic.

There is also an assumption in the document that unimplemented permissions will create the additional land required for development, as will existing vacant accommodation. However, this is overly simplistic and a dangerous strategy to rely on. Some of the vacant accommodation will be lost to other uses, and indeed may be more suitable to other uses, and the amount of vacant accommodation in the Borough is not a constant. Such a policy does not therefore allow for growth and also does not take into consideration that some of the vacant, outworn accommodation is simply no longer desirable for
commercial purposes and therefore is better placed for redevelopment to other uses, some of which will be under permitted development rights. There is also limited ability for existing employment areas in the Borough to intensify. The majority of the Borough’s stock comprises of developed estates with little or no expansion capacity.

It is important that the Local Plan and the allocations within it are based on a progressive evidence base that seeks to encourage new business as well as supporting existing ones.

It is also relevant to highlight that the allocations in the 2003 Local Plan were insufficient and did not meet need. This document allocated 21.7ha of land for employment purposes. However, the 20ha recommended in the Assessment is essentially the same as this insufficient allocation;

therefore it would seem that the Council were at risk of repeating past mistakes in under-allocating for employment need. 20ha also breaks down to a mere 0.8ha of land a year (over the 25 year period considered in the Assessment) which equates to a very small level of commercial floor space. This is clearly not enough to meet with need.

It is clear on the basis of the very real need identified for commercial development that there is a need to identify suitable sites outside of the main urban areas and settlement boundaries, which the Local Plan seeks to do. It is important that this is integrated within largescale new housing developments as sustainable growth across the Borough and balanced communities based on mixed use principles. It is also essential that an adequate amount of land is allocated, as too little land will stagnate the Borough’s economic growth and development is needed to attract growth and jobs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  
- Onslow Park Vision Document.pdf (8.1 MB)
- Onslow Park Planning Statement.pdf (2.1 MB)
- POLICY I1 & APPX C_20160715133341.pdf (3.4 MB)
- Onslow Park Site Accessibility Appraisal and Transport Feasibility Study Report.pdf (1.5 MB)
- Onslow Park LVIA.pdf (3.4 MB)

Comment ID: PSLPA16/4174  Respondent: 15145377 / WYG (S Fidgett)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6.0 CONCLUSIONS

This document forms a written Planning Submission, prepared on behalf of The Trustees of the Clandon Estate in relation to the Draft Local Plan: Strategy and Sites (herein referred to as “the DLP”).

The submission proposes the allocation of land known as ‘Onslow Park’ lying to the south of the A25, Epsom Road, Guildford for a sustainable urban extension. The proposed allocation would result in a mixed use, residential led development that would provide a mix of housing, education campus (including primary and secondary school), employment (B1a office), medical centre, small convenience store, recreation and community facilities, traveller pitches, public open space and landscaping. In order to facilitate the allocation, it is also proposed that the site is excluded from the Green Belt.

The initial masterplan, which illustrates the key principles underpinning the vision and how the proposed garden village might look, is set out in the accompanying ‘Onslow Park Vision’ document.
Whilst we may all question the need for development within the area, the Lord Onslow and the Trustees of the Clandon Estate recognize that the needs of the community need to be met and that any policies and proposals included within the Plan should contribute positively to sustainable development.

This means meeting the needs of the environment, the economy and the community and must provide enhanced access to a range of homes, community facilities, jobs and open spaces to as many people as possible.

Hence we consider that the major part of the development the Borough needs should be well related to the urban area of Guildford as its primary town and which provides the widest range of facilities for the people of the Borough.

Only by locating new development and new facilities within or on the edge of the main centre of population can development be truly sustainable. Here, it can maximize access to the homes, jobs and community facilities proposed and enhance the lives of as many people as possible. It is the only way to provide real choice in modes of transport, maximizing access to walking, cycling and modes of transport other than the car, including park and ride and good quality rail services.

The proposals for the allocation of Onslow Park recognize the potential for a sustainable new community to be formed as an extension to the town that benefits the adjoining community.

The proposals would provide for new recreational and open space facilities, including a new cricket pavilion and pitch, a new secondary school, healthcare provision, employment, community facilities and a balanced mix of housing, including family housing, retirement accommodation and affordable and starter homes.

All would be set within a landscaped community that provides pedestrian and cycle access to the downs at Newlands Corner and to the countryside beyond.

It is considered that the land at Onslow Park should be identified in the Local Plan for the following reasons:

- The site is in a sustainable location and recognizes the role of Guildford as the principal town within the Borough, with good access to public transport and a wide range of cultural, social, retail, leisure and other facilities and services
- The allocation would be compatible with a sustainable spatial strategy channeling growth to the principal town in the Borough to support its growth and achieve sustainable patterns of development that reduce the need to travel;
- The proposed uses would complement and be compatible with adjacent land uses, enhancing access to recreational, educational and other facilities for the existing and proposed community
- The proposed development would work with and support other nearby development that is proposed for inclusion in the Local Plan
- The proposed development would also support the key infrastructure that supports the growth of Guildford and its economic prosperity, including new pedestrian and cycle facilities, the proposed Merrow railway station, schools and other facilities
- The development proposed includes a mix of uses that together support a sustainable new community and help support existing community facilities within the area, providing new housing, employment, public open space, community facilities and a high quality, landscaped environment
- The provision of new employment space and a potential new hotel, supports the economy of the Borough and helps balance the needs of the community, local tourism and local business
- The proposals enhance recreation and provide new recreational routes (pedestrian, cycle and horse) linking Merrow and the North Downs
- The site is contained and forms a natural urban extension that is well defined and presents a strong urban edge, which will ensure that their development will not harm the purpose or openness of the wider Green Belt
- The developable area of the site as identified within the illustrative masterplan is not constrained by any other sensitive planning designations
- The site is not subject to significant infrastructure or environmental constraint and is deliverable within the first period of the plan, providing between 150-200 homes each year and being complete within between 5 and 7 years
- The proposals maintain a landscaped buffer with existing housing, so protecting the amenities of the adjoining properties and providing enhanced recreational routes, through new footpaths and open space
- Enhances nature conservation through new meadow, woodland planting and associated habitats and protects existing designated sites. Part of the site is within the Special Protection Area and appropriate SANG delivery would be discussed with the Council and could include on or off site delivery or any necessary payments to assist existing identified projects.
- Provides for low carbon, sustainable living, tackling the effects of climate change.
- The site is not subject to access, flood risk, nature conservation or other overriding constraints.

The proposals are therefore commended to the Borough Council as part of the assessment of the Submission Local Plan.

**Sustainability Appraisal**

Given the failings in the assessment of the land forming part of these representations in the Sustainability Appraisal that accompanied the Green Belt and Countryside Study, we would question the sustainability appraisal that accompanies the Plan. This has not adequately considered the most sustainable spatial strategy for the Borough in line with the NPPF which would focus growth on sustainable locations within and urban extensions around Guildford first.

It is essential for the sustainability appraisal to be recast using a hierarchy approach to the definition of settlements and the resulting sustainability of sites identified and ranked according to accessibility to goods and services and to the main centres of population. This should also take account of the need to tackle the effects of climate changes and minimise the need to travel, while maximising the opportunities for people to use walking, cycling and means of transport other than the car.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPA16/4561  **Respondent:** 15145377 / WYG (S FIDGETT)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Clandon

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**3.0 DELIVERY AND SUITABILITY**

**Overview**

The development of Onslow Park is possible within the early part of the Local Plan period, ensuring a meaningful contribution to supply within the initial years of the required housing trajectory, when starts on site projected within the Plan are lower than they might otherwise be and are below the level required to meet OAN.

The relationship of supply with the housing trajectory is considered further in the next section.

The potential for the early delivery of the proposed development is important also for the social and economic infrastructure proposed. Early delivery of Onslow Park within the plan period would result in improved access to open space, recreational facilities, healthcare facilities and employment opportunities for existing local residents.

**Availability**
This submission confirms the availability of the land. The landowners, the Trustees of The Clandon Estate, for the Earl of Onslow, and the existing golf course operator are in agreement that the land is available and would be developed as proposed, should the site be identified in the Local Plan process.

There are no other owners or occupiers of the land. Both parties are committed to delivering the site and substantially commencing development within the first five year period of the DLP.

Lord Onslow and the Trustees also propose a continuing, long term involvement in the management of Onslow Park. It is proposed that all common parts, including community spaces and a substantial part of the housing stock proposed, would be retained by the Estate and managed for future generations. The aim in large part, is to help create a sense of place and belonging for the community with a commitment to the long term management and quality of the environment, infrastructure and facilities.

**Construction**

It is proposed that the development would commence within the first 5 year period of the Local Plan and would be likely to contribute up to 200 homes each year over a 5 year period. It should be noted that this corresponds to the period of least supply within the Local Plan trajectory, which is below OAN for the first noted that this corresponds to the period of least supply within the Local Plan trajectory, which is below OAN5 years of the Plan from the date of likely adoption.

As many of the homes will be either affordable homes or private rented stock, the development can proceed at a faster rate than may often be considered if constructed through more traditional methods which are dependent on the rate of market sale.

It is also proposed to adopt a contractor led approach to the delivery of such housing, using modern methods of site fabrication which facilitates a quicker delivery on site.

The provision of a proportion of serviced self-build plots offers a further delivery route for part of the supply.

**Sustainable Design and Construction**

The ability to use off site construction techniques also means that the sustainability of the design and performance of the homes and buildings provided will meet the highest specification and result in sustainable, low carbon living that reduces energy and resource demands, delivers low fuel bills and running costs for residents and a low carbon footprint, tackling the effects of climate change.

**Infrastructure**

The site is not dependent on significant up front infrastructure requirements that would prevent or slow housing delivery.

A suitable vehicular access exists from the existing park and ride and golf course junction onto the A25 Epsom Road and this would be utilized as the principal site access. A secondary access and egress is proposed to supplement this also onto the A25. This submission is supported by a Transport Feasibility Study 2016 that sets out the proposed accessibility and transport implications of the development proposed, in conjunction with the development options identified in the Submission Local Plan and Infrastructure Delivery Plan.

While some localized off-site improvements are required as a result of existing projected growth on the highway network, these are already identified in the IDP as part of the Local Plan proposals and would be supported, where necessary by additional contributions from the development of Onslow Park under both CIL and s106 obligations.

The site is well located as an extension of the existing urban area to access a full range of goods and services and benefits from easy walking, cycling and bus services. Aside from minor, localized improvements to facilitate enhanced connections between the site and the surrounding footpath and cycle network, there are not wider requirements that would add to the commitments in the Local Plan.
The expansion of the park and ride within the site to double its capacity significantly enhances the ability of the site to remove existing car journeys entering Guildford from the A25 to the east and offsets a significant proportion of vehicle movements.

The provision of additional and enhanced community facilities as part of the garden village proposals increases the level and quality of services available to the existing community within Guildford in an accessible and inclusive manner. This includes the sports hub, the primary and secondary schools, community facilities and community parkland, all within easy reach of the existing urban area, and extending to the Downs beyond.

4.0 JUSTIFICATION

In general the overall approach identified within the Local Plan is supported, that in order to meet the needs of the Borough and its residents, a range of housing, employment and other facilities are required over the period of the Plan and that these must be provided for in line with those needs in order to maintain and provide for a prosperous, vibrant and growing economy with access to high quality housing and a full range of services for all members of the community. At the same time, this must be balanced with the maintenance and enhancement of the built and natural environment of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/18697</th>
<th>Respondent: 15145377 / WYG (S Fidgett)</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy D1: Making better places

5.10 We agree that high quality design should be sought in all new developments. We are supportive of the good design principles outlined in the policy outlining that all developments will:

- promote and reinforce local distinctiveness to create a sense of place. Innovative architecture will be encouraged and supported in the appropriate context;
- be expected to have regard to and perform well against Building for Life criteria;
- be expected to use art and materials of a nature appropriate to their setting;
- take account of the context in which they are sited.

5.11 We also agree that in schemes of 20 or more dwellings or 0.5 hectares or more developments should make provision for a mix of uses, and the facilities and services needed by the new community. We agree that this should include places for communities to meet and interact, such as play and recreation and other public spaces.

5.12 We agree that new development should be designed to facilitate and promote walking and cycling by providing a high quality environment for pedestrians, convenient and safe routes through the development and to nearby areas for cyclists and that where possible, residential development should allow short walking distances to amenities.

5.13 We are in agreement that priority to non-car based modes of transport should be given, and we wish to emphasise that park and ride facilities make an important contribution to non-car modes of transport into Guildford centre. This is the case for both neighbouring residents who can walk/cycle to the facilities, as well as those from further afield who drive and
park, who would otherwise drive into the centre of Guildford. Park and Ride facilities provide an important and significant reduction in automobile traffic, congestion, fumes and pollution in Guildford and thus enhance the environmental quality of Guildford town centre.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Comment ID: PSLPP16/18700</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy D3 Historic Environment

5.16 We agree that where new development would have an impact on heritage assets, it should make a positive contribution to local character and distinctiveness having regard to the significance of the heritage assets and their setting.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E1 Sustainable Employment

We are largely supportive of this policy which seeks to allocate land for employment floor space across the Borough, but this is not enough and reference needs to be made to early delivery due to the backlog of economic need, owing to lack of allocations/releases in recent years. A greater choice and diversity of sites is required, including those in mixed use major allocations such as that proposed at Onslow Park, which can provide a new business hub as part of a sustainable new community as part of an urban extension on a key transport route into Guildford.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Policy E2 Location of New Employment Floorspace

In addition to the five developments where ‘the employment areas of the following sites will be designated as new strategic sites’, the development proposed by this submission, at Onslow Park, should be allocated for employment allocation under Policy E2, as part of the wider mixed use allocation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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</table>
Policy H1 Homes For All

Generally, we support the flexible approach that this policy seeks to adopt, particularly with regard to housing mix and density which allow for greater consideration to be given to the characteristics and location of an application site. These aspects of this policy will help to ensure that new development complements existing built and natural environments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Policy H2 Affordable Homes

It is acknowledged that affordable housing in the Borough is much needed and this is supported, however an important issue when considering affordability is that housing should be provided to meet with need (the objectively assessed need) which does not solely focus on affordable housing and should be open to the consideration of arrange of tenures, consistent with Government policy. Local authorities need to ensure that sufficient market housing is provided as this will mean that more people can own their own home and house prices in general will be lowered. If affordable housing thresholds are set too high it will preclude valuable sites from coming forward, which will perpetuate the issue of a lack of housing in the Borough, thus continuing to drive prices high on the basis that supply does not meet demand or need.

The characteristics of Guildford also need to be considered. It is a Borough where 85% of the dwelling stock is owner occupied; therefore whilst there is an affordable housing need this needs to be balanced with its population’s desire to own their own home and to work with the provision of private rented, discounted private rented and other models of housing delivery.

The policy should not require the provision of land for affordable homes at nil value. This is an inappropriate and unnecessary intervention in the market and will affect viability and hence delivery of homes. The key policy requirement is the provision of an increased level of housing to meet OAN and to meet the requirements of affordable homes, starter homes and private rented stock. There are a variety of models available for the supply of housing, including discounted market rent and affordable rents and for starter homes and other initiatives.

We do not believe that specialist housing should contribute towards affordable housing provision. Such accommodation (care homes / students halls etc) tend to be provided by specialist providers who would not be attracted to the Borough if they were required to provide onerous affordable housing contributions yet they make a very important contribution to the diversity of housing stock in the Borough and help ensure that all local needs are met.

We do however support that affordable housing provision is subject to viability. Though, by artificially and unnecessarily lowering the thresholds of provision to levels that realistically will not be achievable the Council are developing a policy which means that viability will be a standard practice for all development; whereas it should only apply in some cases.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy 11 ‘Infrastructure and Delivery’

5.19 It is acknowledged and accepted that development should provide for the infrastructure requirements that arise from it. Priority should be given to those sites that can support the provision of infrastructure in key urban locations, where they benefit most people.

5.20 It is of significant concern that the development of the housing needed and the related employment and other facilities is in effect held back in terms of the housing trajectory, by the rate at which infrastructure can be delivered. We are also concerned that this may not be effective given the size of the funding gap that has been identified in the background to the Local Plan and will in effect, prevent delivery of the Local Plan’s housing and other commitments.

5.21 While the size of the funding gap is a concern and may undermine the effectiveness and soundness of the Local Plan, it is also the case that the reliance on CIL for part of this, detaches delivery of infrastructure from the delivery of housing. In effect, housing would be consented under the terms of CIL and a resultant payment made, without there being a commitment to the timing and delivery of the related infrastructure. While there is a clear intention and link, no guarantee exists and it is not considered possible to delay permission or condition this on the actions of a third party providing the relevant infrastructure. This is an issue for the plan to resolve.

5.22 Ultimately, sites should be identified that focus the support for and investment in essential infrastructure within and around the urban area of Guildford. This maximises the potential that the infrastructure will come forward, will benefit the most people within the Borough and any funding gaps are minimised.

5.23 Contributions should clearly only be sought where they are (i) necessary to make a development acceptable in planning terms; (ii) directly related to the development; and (iii) fairly and reasonably related in scale and kind to the development proposed. In this respect they have to be compliant with the CIL regulations.

5.24 Consideration also needs to be had to the viability of providing for infrastructure, which needs to be weighed against the very real need for housing and employment in the Borough. To this end any future policy documents in relation to infrastructure should have full consideration of paragraph 173 of the NPPF which states that that sites and the scale of development identified in a plan should not be subject to such a scale of obligations and policy burdens where their ability to be developed viably is threatened. This also relates to affordable housing requirements sought from allocations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy I3: Sustainable transport for new developments

5.25 We agree that new developments should provide the best sustainable travel options possible, and we consider that this is necessary for both sustainable development and prosperity. Development in unsustainable locations should be avoided and where unavoidable, should be required to provide for the essential infrastructure requirements needed to support the development.

5.26 The location of development is key in this regard and the commitment noted earlier in these representations, should be towards a sustainable spatial strategy that focuses development and growth to Guildford as the key town within the Borough and the location that maximises the benefit arising from investment in services and infrastructure and optimises the use of pedestrian, cycle and public transport modes.

5.27 We support the fact the policy outlines Park and Ride facilities as a form of sustainable travel, and that new development should secure appropriate improvements to public and community transport, including infrastructure and park and ride requirements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18698  Respondent: 15145377 / WYG (S Fidgett)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P1: Surrey Hills Area of Outstanding Natural Beauty (AONB)

5.14 We are supportive of the policy that the designation of AONB does not preclude specific types of development and that proposals will be assessed on their individual merits. We have concern over the continued reliance on the AGLV given that policy has moved towards landscape characterisation and assessment rather than local level designations. The AGLV in particular should not prevent development that is otherwise sustainable and in the interests of the Local Plan. In particular the land at Onslow Park should be removed from the AGLV since it was remodelled as part of the golf course redevelopment in recent years and is isolated from other parts of the designation with clear boundaries to the AONB.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18699  Respondent: 15145377 / WYG (S Fidgett)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy P2: Green Belt

5.15 We agree that the Metropolitan Green Belt should be protected against inappropriate development in accordance with national planning policy to maintain its openness and open character. We consider that the land at Onslow Park should however, be excluded from the Green Belt as shown on the proposals map in accordance with the boundary identified in these representations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S1 ‘Presumption in Favour of Sustainable Development’

We support the presumption in favour of sustainable development and the Council’s commitment to work proactively with applicants to jointly find solutions that mean proposals can be delivered wherever possible. However, this commitment does need to be used positively at ground level in the decision making process when determining planning applications.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Spatial Strategy and Sustainable Development

We agree with the strategy that directs development to those sites that are within and adjoin Guildford as the principal settlement within the Borough and which is clearly the most sustainable location for development. The proposed allocations of Gosden Hill (A25) and Blackwell Farm (A26) are recognized in principle as sustainable locations for growth, being well related to the main urban population and all of the services, infrastructure and facilities that Guildford provides and subject to consideration of detailed issues relating to each of these proposed areas. While we offer no view on the details of these allocations, the principle of sustainable urban extensions is clearly established in the rationale for these sites.

This strategy helps support a wide range of services and facilities within the town, including comprehensive healthcare, social services, education, retail and leisure, employment and public transport. In focusing development in the principal town, the maximum benefit is derived, providing access within easy reach of the major part of the Borough’s population.

4.4.1 However, this strategy is not clearly or expressly stated in the rationale within the Local Plan and the strategy is not properly considered further in relation to the other opportunities to achieve similar sustainable urban extensions, such as Onslow Park.

4.4.2 Were this to be identified alongside these two proposed allocations, it would be entirely complimentary and consistent with their identification. Indeed it would add a further element to the sustainable spatial strategy, in supporting the funding of infrastructure necessary to support the wider aims of the Guildford urban area, which less sustainable, disconnected locations would not.

The Spatial Vision of the proposed Local Plan is set out on page 19 and commits as its starting point to meet the identified growth needs of the Borough. This is supported.

However, neither this Spatial Vision, nor the subsequent Core Themes, appear to contain any overarching spatial strategy that recognizes the role of Guildford as the principal town within the Borough and prioritizes this as the most sustainable location for growth. The only real reference is in retail terms.

As such the Spatial Vision and resulting allocations are inconsistent with national planning policy and are neither sound, effective nor properly justified.

Paragraph 6 of the NPPF comments on the role of the planning system:

“The purpose of the planning system is to contribute to the achievement of sustainable development. The policies in paragraphs 18 to 219, taken as a whole, constitute the Government’s view of what sustainable development in England means in practice for the planning system.”

Paragraph 17 of the NPPF sets out 12 core principles of the plan making process. This includes the principle to:

“actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable”

We are concerned that this has not been fully considered or reflected in the spatial strategy of the Local Plan. As such, neither is it reflected in the proposed allocations made within the Submission Local Plan. This is a clear omission.

Paragraph 30 of the NPPF further elaborates on this, commenting:

“Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.”

This is clearly relevant to the spatial strategy of the Local Plan, which should seek to accommodate growth in and around those locations that are most sustainable and reduce the need to travel and optimize the use of pedestrian, cycle and public transport.
transport. This essentially requires a settlement hierarchy and as a matter of principle, the identification of growth in accordance with these sustainability aims.

This is further reinforced in paragraph 34 and 35 of the NPPF:

“34. Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. However this needs to take account of policies set out elsewhere in this Framework, particularly in rural areas.

35. Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to

- accommodate the efficient delivery of goods and supplies;
- give priority to pedestrian and cycle movements, and have access to high quality public transport facilities;
- create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones;
- incorporate facilities for charging plug-in and other ultra-low emission vehicles; and
- consider the needs of people with disabilities by all modes of transport.

The Local Plan should encourage development in and adjoining the Urban Area of Guildford first. It may also be relevant to consider the next settlements in the hierarchy at Ash and Tongham and then the higher order villages. This should be according to a hierarchy that places Guildford at the top, as the highest order centre, the most sustainable centre and the preferred location for sustainable growth.

This was reflected in the initial stages of the Countryside and Green Belt Study which commented:

“It was originally considered that land parcels adjoining the urban areas of Guildford, Ash and Tongham may be more sustainable in terms of potential development (refer to Volume I, Section 6).”

Notwithstanding this view, the parameters of this study were though later refined by the Council to reflect their wish to consider villages and new settlement proposals (Wisley) also.

Paragraph 4.1.6 adopts a partial if somewhat unclear step in this direction, prioritizing previously developed land in Guildford town centre, urban areas, inset villages and Green Belt villages. It confuses however, the use of previously developed land (a policy that is also supported) with a sustainable spatial strategy, which is about access to housing, goods and services, reducing the need to travel and tackling the effects of climate change. No justification is given for the approach.

The paragraph and hence the Plan’s strategy appears to be at odds with the policies of the NPPF in having no consistent regard for sustainability and the spatial strategy this requires.

Indeed paragraph 4.1.8 incorrectly suggests these are all sustainable locations. What they are in essence, is simply locations that are within existing settlements but which have no regard for the relative sustainability as defined by Government or to other locations on the edge of Guildford that may be more sustainable.

Paragraph 4.1.8 therefore, fails to deal adequately or at all with sustainability or spatial prioritization in the release of land in the locations identified. It has no regard to the accessibility of the location or the degree to which there are real and genuine choices in the mode of travel and true accessibility to a wide range of goods and services. This would place urban extensions to Guildford and the other main lower order settlements above other remote locations away from established settlements and around villages. This is also at odds with the clear thrust of the NPPF.

It should therefore, be made clear that the most sustainable locations for growth are in and adjoining the urban area of Guildford. Onslow Park should, as such, be identified as a sustainable location for growth and identified as an allocation as part of a sustainable spatial strategy, in accordance with national policy.

Policy S2 Borough Wide Strategy and Housing Trajectory
Policy S2 commits to the provision of new homes and employment space within the Borough over the Plan period. The level of growth identified seeks to meet objectively assessed need (OAN) and hence meet the needs of the community for homes and jobs. This is supported.

The Submission Local Plan makes provision for the delivery of 13,860 new homes over the plan period (2013-2033). This equates to 693 dwellings per annum which matches the identified housing need through the SHMA based on 2012 projections. The draft Local Plan ties the proposed trajectory however, to the delivery of strategic sites, the rate of which is limited by infrastructure provision:

“The delivery of new homes is expected to increase over the plan period, reflective of timescales associated with delivery of strategic sites”.

However, as a result the trajectory identified within the policy (shown below) provides for a deficient level of housing within the initial 5 years of the Local Plan period post adoption an up to 2022/23, compounding the cumulative shortfall to date. The trajectory is well below the level required to meet OAN of 693 homes each year up until that point, based on the SHMA.

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This shows that there is proposed to be an increasing level of delivery over time as the plan progresses through the plan period. On this basis, to ensure the minimum housing requirements of 693 dwellings per annum are to be delivered, the Plan seeks to counter a shortfall in the first 6 years of the Plan period with an increased trajectory in the final 5 years of the Plan period.

As the net completions table also shows, the first two years of the plan period 2013/14 and 2014/15 have delivered significantly fewer than 693 dwellings per annum. The previous interim housing figure of 322 dwellings per annum agreed on May 2012 did not take account of up to date assessments of housing need and therefore was not NPPF compliant. Reliance on this figure has meant that the Borough has under-delivered even at this level on housing needs over the past five years:

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<td>2013/14</td>
<td>137</td>
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<tr>
<td>2014/15</td>
<td>242</td>
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</table>

Within the Plan period in the last 2 known years 2013-15 this has resulted in a shortfall well below the 693 required each year, being little more than around 6 months supply in the last 2 years, with no identified strategy or basis to catch up until
the final 5 year period to 2033. This is considered simply too late and it must be recognized that this continues the negative impacts of inadequate access to good quality homes to a degree that is simply not justified.

Important to the consideration of the robustness of the Local Plan is the requirement within the NPPF to plan positively to meet the objectively assessed needs of the area and to achieve sustainable development. There is now a positive approach to growth as stated within paragraphs 17 and 28 of the NPPF.

It is important to recognize that the housing needs identified within the Borough represent the needs of the community, if there is to be sufficient housing to meet the needs of the population, including starter homes, family housing, retirement and including specialist forms of housing and affordable homes. If these needs are not met then the community and parts of the community in particular, are denied access to good quality housing at a price they can afford, which in turn gives rise to unacceptable social and economic impacts for the Borough.

As the housing completions above show, Guildford has not only been under-delivering against the real need but there has also been consistent under-delivery against the interim housing target and no planned increase above the level needed until close to 2033.

The most recently produced Annual Monitoring Report (AMR), published in October 2015 for the period 2014/2015 showed that net completions of dwellings in the borough for this period was 242 and that the majority of homes completed in this period are on sites of under 20 homes. As the AMR advises:

“the number of new homes completed this year (2014/15) is still lower than required to meet our objectively assessed need…contributes to a growing deficit of new homes”.

The recommendation within the AMR following this states that:

“housing provision is currently restricted by the lack of available and deliverable development land in the borough….delivery rate is only likely to increase when larger areas of land are suitable and available for development”.

As such, there is a clear need for an immediate increase in the level of supply being achieved.

This required increase in supply should focus on available sites that are not unduly constrained in terms of their ability to come forward for development and that are located within the most sustainable locations. The main reason given for the failure to increase supply to the required level in the early years is the inability to deal with the infrastructure requirements that have been identified to accompany growth. The plan essentially adopts a supply approach predicated on the prior or contemporaneous delivery of supporting infrastructure.

This further supports the clear and pressing need for the identification of Onslow Park, given its ability to contribute immediately to the supply of homes in the most sustainable location and in accordance with a clear and sustainable spatial strategy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18694</th>
<th>Respondent: 15145377 / WYG (S Fidgett)</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ( )</strong></td>
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</table>
Policy S2 ‘Borough Wide Strategy’

As detailed in Section 2 of our Statement we do not believe that the correct housing target has been adopted, and have serious concerns that the Local Plan does not provide for the Borough’s objectively assessed need in terms of the correct housing trajectory, meaning the Plan is deficient in supply for the major part of the Plan period. It is clear from the draft SHMA that the minimum housing number that should be adopted is 693dpa, though in reality a higher figure would make a real difference to meeting affordable housing need. It is also of concern that no specific need has been identified as being met for specialist forms of housing, such as retirement housing.

We do not agree with the development allocations in Table 1 – ‘Delivery between 2015 and 2031’. We believe that a new garden village and Sustainable Urban Extension to Guildford at Onslow Park should be included, in line with this submission. This would deliver approximately 1000 new market and affordable homes and would make a significant contribution to housing supply in the first part of the Plan period, recognizing the shortfall noted above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/224  Respondent: 15146017 / Liam Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I object because there is not enough evidence for this submission to go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: SQLP16/226  Respondent: 15146017 / Liam Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)
I object as it can not be legal to build on the greenbelt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/227  Respondent: 15146017 / Liam Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I object due to there being no GBC transport assessment being available to the councilors for the vote taken on the 24th May as it was published on 6th June. Therefore infrastructure overload has had little attention.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/229  Respondent: 15146017 / Liam Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I object as his does not comply with the duty to cooperate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/230  Respondent: 15146017 / Liam Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

| Comment ID: PSLPS16/303 | Respondent: 15146049 / Ian Tulloch | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44 |

I object strongly to the proposed plans to removed Send from the greenbelt by building so many houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPS16/303 | Respondent: 15146049 / Ian Tulloch | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44 |

I object to the proposed plans to removed Send from the greenbelt by building so many houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
OBJECTIONS TO THE LOCAL PLAN

With reference Policy A44 (Land west of Winds Ridge and Send Hill) in the Guildford Borough Proposed Submission Local Plan: strategy and sites June 2016

I object to the inclusion of this site because it is NEW and was not included in the regulation 18 draft and has NOT been consulted upon previously.

I object because its development for housing is inappropriate owing to its permanent Green Belt status. The Green Belt was originally proposed in 1935 to ensure space between villages and not turn into an urban sprawl. No one has the right to take this away from us - once its gone its gone for ever which will have a huge impact for our future generations.

I object on Health and Safety grounds since the subsoil of the existing landfill site contains documented unsafe landfill waste which is currently vented and monitored. Any disturbance of this waste for housing development gives rise to environmental risks (methane gas, asbestos etc). When purchasing our home in 2010 our Environmental Survey reported issues with regards to the landfill site - we experienced lengthy delays whilst consulting with Guildford Borough Council over this matter.

I object to the siting of the development because the narrow width single track country road (with no pavement) provides insufficient access, particularly with the expected increase in traffic. The road already gets blocked due to the school at the end of the road twice a day.

I object to the adverse impact on the tranquillity of the recently enlarged cemetery.

I object to the loss of wildlife habitat as the site is home to many species of bird, reptile and insect.

I object to the adverse impact on the character of the village as a desirable, pleasant place to live. The proposal to build over 400 houses will have a huge impact on the local schools, doctors and transport.

I wish my objections to be brought to the attention of the Government's Planning Inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object because Green Belt land does not need to be built over. Half of the new homes could be built on brownfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/233  Respondent: 15146049 / Ian Tulloch  Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate</td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I object that Policy A44. 1.9 ha (land west of Winds Ridge and Send Hill) is NEW and was NOT included in the regulation 18 draft and has NOT been consulted upon previously.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/234  Respondent: 15146049 / Ian Tulloch  Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I object that Send should be removed from the Green Belt. It provides a buffer between Woking and Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: pslp172/831  Respondent: 15146049 / Ian Tulloch  Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the changes to Policy A42 at Clockbarn in Tannery Lane because: -

The increase of 33% in the number of homes is too great.
The previous objections by local people have been ignored.
Traffic problems in Tannery Lane will be considerably worsened.
The erosion of the Green Belt will be unacceptably increased.
Flooding risk, already bad, will become worse.
There will be a negative impact on the countryside views from the River Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the changes to Policy A43 at Garlick’s Arch because: -

The previous objections by local people have been ignored.
It is beautiful Green Belt and no “exceptional circumstances” exist.
It will join up Ripley and Send and defeat the key purpose of the Green Belt
The lane is contaminated with lead shot.
It will generate excessive traffic blocking up the local roads of Send and Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<tr>
<th>Comment ID: pslp171/98</th>
<th>Respondent: 15146049 / Ian Tulloch</th>
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</table>

I object to the changes to Policy A58 at Burnt Common because:

There is no need to build industrial or warehouse developments in the middle of the Green Belt when Slyfield and Guildford still have empty sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPA16/711</th>
<th>Respondent: 15146529 / D C Ellis</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
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</table>

I object to the changes in Green Belt Policy 2 at paragraph 4.3.15 because:

Further expansion and development at this location would detract from the openness of the Green Belt and once lost it can never be recovered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I strongly object to the above proposed planning development by eroding Send's Green Belt status on the above site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/712  Respondent: 15146529 / D C Ellis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Send Hill is obviously a narrow single track lane, having managed to retain it's peaceful, beautiful countryside, currently enjoyed by all residents and dog walkers from other areas. For this reason it has permanent Green Belt status.

It is totally inappropriate to increase the traffic flow. The junction where it meets Potters Lane is very dangerous and residents have suffered accidents as a result of being unable to see any oncoming traffic. I rely on sound alone when pulling out and have narrowly avoided head on collisions in the past and therefore also make my objection on the grounds of safely.

Send's infrastructure cannot cope with the current population, the problems with doctor's appointments, school places and traffic are consistent. The Council would be well advised to ensure that it provides acceptable standards of living for the current residents before irresponsibly placing further stress on the living conditions of it's current council tax payers.

Please confirm receipt of this letter and advise the Council's statutory requirements regarding proposed planning consultations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1104  Respondent: 15146529 / D C Ellis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to your proposal to allow 40 houses and 2 travellers pitch sites, this being a newly designated site and not included in the regulation 18 draft. Therefore correct procedure has not been carried out by yourselves.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/599  Respondent: 15146689 / Alex Barber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **Inadequate consideration given to Infrastructure Delivery.** I reaffirm my objections to the revised plan for the Former Wisley Airfield/Three Farms Meadow site at Ockham. Despite having been previously unanimously rejected by Guildford Borough Council planners, it has not only been included, but enlarged on the new draft plan. Inadequate consideration is being given to supporting services, including schools, medical centres, public transport including rail capacity and railway station parking, which are already overloading. Housing growth needs to be organic and sustainable in the context of other resources; this development is not. The viability of the proposal also relies upon the Road Investment Strategy by the UK Highways Agency to develop the A3/M25 interchange. These have not been finalised, and do not consider the additional burden created by the Wisley Airfield, Garlick’s Arch and Gosden Hill developments which are explicitly designed to empty their traffic burden onto that interchange. Four thousand or more extra cars using this intersection every morning and evening will cause chaos. The natural consequence of this overloading will be the overspill onto trunk roads and minor lanes, which not only are not designed for such heavy use. There will be increased risk to vulnerable road users such as pedestrians, riders and cyclists on crowded routes with no footway and few cycle tracks.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/598  Respondent: 15146689 / Alex Barber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **Lack of protection for the Green Belt and the Historic Environment.** I object to the plan Ripley to be taken out of the Green Belt and designated as a “District Centre”. Further, the boundary for the Primary Shopping Area is to be contiguous with the the boundary of Ripley itself, opening the door to commercial development outside of the High Street. This this is being done without any prior consultation and without following proper procedure, which is unacceptable. It does not consider the current paucity of parking, yet proposes to add to the burden. It also increases the traffic burden on the interchange with Newark lane and Rose Lane in the village centre, identified choke points. It also threatens to change the nature of Ripley as an Historic Environment whose important presence on the Portsmouth Road has resulted in a significant number of Listed properties on the High Street and wider. It would be more suitable to designate Ripley as a rural Local Centre and to protect its heritage nature. I also understand that the previous plan for the Burnt Common site which was allocated for light industrial, general industrial and warehousing and 100 houses has been replaced with a new proposal, Garlick's Arch. This includes increased light and general industrial units and 400 houses, as well as a new 4 way on/off junction for the A3 to support Gosden Hill and Wisley Airfield as well as developments in the East of the borough. The site that is earmarked for this development has permanent green belt protection. There is no proven need for additional housing or industrial development in this area and contributes to an entirely disproportionate building burden on this area. The open character of Ockham with its Commons and RHS Wisley, Ripley with its historic Village Green and the Wey navigations, and Send Marsh, all make important contributions to the Green Belt and should be included rather than being inset. I strongly disagree that exceptional circumstances exist to justify the amendment of the Green Belt boundaries in this area against national planning policy. On the contrary, the development of the sites at Garlicks Arch and Gosden Hill Farm, combined with proposed limited infilling in West Clandon would result in the coalescence of urban sprawl from Guildford all the way to the M25.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<tr>
<th>Comment ID: PSLPP16/597</th>
<th>Respondent: 15146689 / Alex Barber</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I live in Ripley and I strongly object to many parts of the new draft local plan for Guildford Borough.

1. **The draft plan places a massively disproportionate and unfair development burden on the portions of the Borough closest to London.** The plan indicates 693 new homes are required per year, and 13,860 new homes by 2033. Yet the Former Wisley Airfield/Three Farms Meadow site at Ockham alone is planned to have 2,200 properties. The Garlick’s Arch proposal adds another 400 houses. The Gosden Hill Farm plan for West Clandon adds another 2,200 houses. Together, these projects represent over 33% of the requirement for the entire borough for the next 16 years, and this does not even include the smaller developments. This is entirely disproportionate, particularly to the Lovelace Ward. The Upshott Lane project adds another 400 houses, in the Borough of Woking but only minutes away from the developments above. It does not appear coincidental that the portions of these Boroughs closest to London are scheduled for overdevelopment to the benefit of areas further away. The draft plan explicitly states that GBC intend to build more new homes than is in the Policy, merely to provide ‘flexibility’. This is unacceptable and unnecessary.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

Page 2510 of 2855
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<tr>
<th>Comment ID: PSLPP16/600</th>
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<tr>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. **Environmental Impacts.** I already have grave concerns over the air pollution in this area and its impact upon both the rare habitats of the Ockham and Wisley Commons as well as vulnerable local residents including children and the elderly. This would only be increased by the additional and disproportionate development proposed for this corner of the Borough.

Please take into consideration my strong objection on the above grounds to the alteration of the draft plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<tr>
<th>Comment ID: PSLPS16/1107</th>
<th>Respondent: 15146721 / Ann Stutt</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object most strongly lo the planning of 1100 houses in Normandy between Westwood Lane and Flexford - you are creating a town within a village on Green Belt land with no thought to the situation of:

1 Traffic on the Guildford Road and up to the Hogs Back via a one way access to the railway bridge in Westwood lane

2 Doubling the population of the village.

3 We already have a very large Village Hall - so why yet another one.

4 Gypsy facilities - we already have more than our quota in Normandy- this should not go ahead.

5 A secondary school - other secondary schools in the area are under subscribed so not required.

Most important GREEN BELT was created to maintain the countryside - why negate it?

Is it a sop to get planning permission?
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/189  Respondent: 15146817 / Sue B  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of provision for improvements to the traffic congestion on the A3.
I object to the lack of provision to improve traffic congestion at the junction of the A3 and M25.
I object to the lack of any immediate provision of Doctors surgeries.
I object to the lack of any immediate provision of new schools.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/607  Respondent: 15146817 / Sue B  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the 2016 draft local plan.
Specifically:-
I object to the in-setting of Ripley, Send, Clandon and Wisley from the Green Belt.
I object to any erosion of the Green Belt in Surrey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: SQLP16/238  Respondent: 15146817 / Sue B  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the last minute inclusion of new sites - specifically Garlick's Arch.

I object to the inclusion of the development at the Wisley airfield site despite it being rejected at planning.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/190  Respondent: 15146913 / Nicola Barber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Inadequate consideration given to Infrastructure Delivery. I reaffirm my objections to the revised plan for the Former Wisley Airfield/Three Farms Meadow site at Ockham. Despite having been previously unanimously rejected by Guildford Borough Council planners, it has not only been included, but enlarged on the new draft plan. Inadequate consideration is being given to supporting services, including schools, medical centres, public transport including rail capacity and railway station parking, which are already overloading. Housing growth needs to be organic and sustainable in the context of other resources; this development is not. The viability of the proposal also relies upon the Road Investment Strategy by the UK Highways Agency to develop the A3/M25 interchange. These have not been finalised, and do not consider the additional burden created by the Wisley Airfield, Garlick’s Arch and Gosden Hill developments which are explicitly designed to empty their traffic burden onto that interchange. Four thousand or more extra cars using this intersection every morning and evening will cause chaos. The natural consequence of this overloading will be the overspill onto trunk roads and minor lanes, which not only are not designed for such heavy use. There will be increased risk to vulnerable road users such as pedestrians, riders and cyclists on crowded routes with no footway and few cycle tracks.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8268  Respondent: 15146913 / Nicola Barber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
5. Impact on Wildlife  the site of the proposed Garlick's Arch is on ancient woodland, there are Badgers Foxes and all manner of other wildlife that will be displaced from their habitat. We need to protect the wildlife in these woods and these ancient trees from destruction.

Please take into consideration my strong objection on the above grounds to the alteration of the draft plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. Lack of protection for the Green Belt and the Historic Environment. I object to the plan for Ripley to be taken out of the Green Belt and designated as a “District Centre”. Further, the boundary for the Primary Shopping Area is to be contiguous with the boundary of Ripley itself, opening the door to commercial development outside of the High Street. This this is being done without any prior consultation and without following proper procedure, which is unacceptable. It does not consider the current paucity of parking, yet proposes to add to the burden. It also increases the traffic burden on the interchange with Newark lane and Rose Lane in the village centre, identified choke points. It also threatens to change the nature of Ripley as an Historic Environment whose important presence on the Portsmouth Road has resulted in a significant number of Listed properties on the High Street and wider. It would be more suitable to designate Ripley as a rural Local Centre and to protect its heritage nature. I also understand that the previous plan for the Burnt Common site which was allocated for light industrial, general industrial and warehousing and 100 houses has been replaced with a new proposal, Garlick's Arch. This includes increased light and general industrial units and 400 houses, as well as a new 4 way on/off junction for the A3 to support Gosden Hill and Wisley Airfield as well as developments in the East of the borough. The site that is earmarked for this development has permanent green belt protection. There is no proven need for additional housing or industrial development in this area and contributes to an entirely disproportionate building burden on this area. The open character of Ockham with its Commons and RHS Wisley, Ripley with its historic Village Green and the Wey navigations, and Send Marsh, all make important contributions to the Green Belt and should be included rather than being inset. I strongly disagree that exceptional circumstances exist to justify the amendment of the Green Belt boundaries in this area against national planning policy. On the contrary, the development of the sites at Garlicks Arch and Gosden Hill Farm, combined with proposed limited infilling in West Clandon would result in the coalescence of urban sprawl from Guildford all the way to the M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I live in Ripley and I strongly object to many parts of the new draft local plan for Guildford Borough which I believe will adversely affect the Village where I live and the other surrounding Villages.

1. The draft plan places a massively disproportionate and unfair development burden on the portions of the Borough closest to London. The plan indicates 693 new homes are required per year, and 13,860 new homes by 2033. Yet the Former Wisley Airfield/Three Farms Meadow site at Ockham alone is planned to have 2,200 properties. The Garlick’s Arch proposal adds another 400 houses. The Gosden Hill Farm plan for West Clandon adds another 2,200 houses. Together, these projects represent over 33% of the requirement for the entire borough for the next 16 years, and this does not even include the smaller developments. This is entirely disproportionate, particularly to the Lovelace Ward. The Upshott Lane project adds another 400 houses, in the Borough of Woking but only minutes away from the developments above. It does not appear coincidental that the portions of these Boroughs closest to London are scheduled for overdevelopment to the benefit of areas further away. The draft plan explicitly states that GBC intend to build more new homes than is in the Policy, merely to provide ‘flexibility’. This is unacceptable and unnecessary.

I already have grave concerns over the air pollution in this area and its impact upon both the rare habitats of the Ockham and Wisley Commons as well as vulnerable local residents including children and the elderly. This would only be increased by the additional and disproportionate development proposed for this corner of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We keep hearing that your Borough Council is listening to the residents of Send and Ripley. But in spite of the enormous response to the last Local Plan, now even more houses and developments are being planned encroaching on the Green Belt which the Conservative pledged to save. Now we have new proposals to build a 4 way junction at Garlick’s Arch. I object most strongly to the last minute proposal with no prior warning. Our villages would become totally overwhelmed and snarled up with yet more traffic.

I also object most strongly to the other last minute plan to build 40 new homes with 2 travellers sites at Send Hill. This is a totally unsuitable area on what was once a landfill site with vents in the ground. Send Hill is a small country lane with no pavements and lived in by elderly people.

Our village has not the roads or the facilities or schools or doctors surgeries to withstand the new Local Plan which was not included in the regulation 18 draft and has not been consulted upon previously.

The site in Green Belt which is permanently protected by the NPPF.

Please this time listen to the residents of Send. Surely after the last meeting at the Lancaster Hall which was full to capacity our concerns must be obvious.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/713  Respondent: 15146945 / E J M Symonds  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object most strongly to the other last minute plan to build 40 new homes with 2 travellers sites at Send Hill. This is a totally unsuitable area on what was once a landfill site with vents in the ground. Send Hill is a small country lane with no pavements and lived in by many elderly people.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/717  Respondent: 15146945 / E J M Symonds  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The site is on Green Belt on Green Belt which is permanently protected by the NPPF.

Please this time listen to the residents of Send. Surely after the last meeting at the Lancaster Hall which was filled to capacity our concerns must be obvious.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID:</th>
<th>PSLPP16/1443</th>
<th>Respondent:</th>
<th>15146945 / E J M Symonds</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object most strongly to the last minute proposal with no prior warning. Our villages would become totally overwhelmed and snarled up with yet more traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/1440  Respondent: 15146945 / E J M Symonds  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We keep hearing that your Borough Council is listening to your residents of Send or Ripley. But in spite of the enormous response to the last Local Plan, now even more houses and development are being planned encroaching on the Green Belt which the Conservatives pledged to save. Now we have new proposals to build a 4 way junction at Garlick's Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2201  Respondent: 15146945 / E J M Symonds  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Once again Send is being targeted with an inappropriate number of houses in a Green Belt area, where our roads, medical facilities and school are not up to coping with [illegible word] and needs.

I strongly object to Policy A.42 on the grounds that it is Greenbelt and the access on to the A247 is already lethal and a further 60 – not 45 as primarily planned, houses would be dangerous. It is a narrow country lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2205  Respondent: 15146945 / E J M Symonds  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy No 58 I object most strongly

This is a most inappropriate area for industrial/warehousing. Guildford already has empty sites in Slyfield and the local roads would struggle with heavy transport. Once again it is Greenbelt!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1180  Respondent: 15147201 / Mary Hollies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I beg you, before you start building new houses in East Horsley’s you give a lot of thought and energy to building extra Junior and Senior school places, Extra Medical space and study the roads.

Most roads are not wide enough for the huge lorries which now use them, so I suggest you ban them from such roads as Ockham Rd. south for example.

Also keep in mind for every new house there will be at least 2 cars.

As East and West Horsley are buffers after Effingham to urban spread, please, please leave it as it is.

I know you have a difficult job but I beg you look ahead

Thank you for reading this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/614  Respondent: 15147201 / Mary Hollies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I beg you, before you start building new houses in East Horsley, you give a lot of thought and energy to building extra junior and senior school places, extra medical space and study to road.

Most roads are not wide enough for the huge lorries which now use them, so I suggest you ban them from such roads as Ockham Road South

Also keep in mind for every new house there will be at least 2 cars.

As East and West Horsley are after Effingham, for the Urban spread, please, please leave it as it is.

I know you have a difficult job but I beg you look ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/618  
Respondent: 15147329 / Brenda Holliday  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I'm in my 70's, so I have to use the doctors surgery in Normandy. At present I have to wait 3-5 days for an appointment. What will happen when upwards of 3,000 people move to the area?

My next door neighbour is a school teacher as is my daughter and they both tell me their schools do not have enough children in them and worry they could lose their jobs, or worse still close down. A school in this housing estate would be very foolish knowing there are vacancies in all parts of Guildford and a total waste of money.

I believe those that have drawn-up the Local Plan have not taken into account the demographics of the proposed land in Normandy and have chosen for what ever reason to over-look roads, flooding and the basic infrastructure of this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/619  
Respondent: 15147329 / Brenda Holliday  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I have a little car but never use it between 7am-10am in the morning and 4pm-7pm in the evening because the A323 is jammed solid. With 2-cars per household and the proposed houses to be built in Ash, Tongham and Aldershot this equates to thousands of more cars using the A323. I think traffic lights or a roundabout will have to be built at the end of Westward Lane and Glaziers Lane because one would never be able to get onto the main Guildford to Aldershot Road. A road bridge at Ash station would be a good idea.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/617  Respondent: 15147329 / Brenda Holliday  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In regard to the Local Plan for Normandy, I would like to draw your attention to a few things here in our village.

I walk my dog Lucy over the fields where the proposed 1,150-houses, school and shops might be built. The fields are under water for 8-months of the years. The farmer that looks after these field has dug-out a ditch 9ft deep and 100yds long in an attempt to drain his fields but it hasn't worked. If all these house were to be built the water run-off would flood the sewage system in Glaziers Lane. The houses all ready have problems with flood water backing up into their toilets, so you see more rain water would perpetuate this problem even more. This awful situation is a genuine concern to me.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/627  Respondent: 15147425 / A Foxall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I'm sorry to say the new GBC plan is no better than the last, in fact worse. I know we need more houses in E/W Horsley, but 533 are too many.

This number will:

a) put pressure on local schools, roads, doctors and hospitals

b) [text unreadable] at East Horsley of Effingham Junction, for people who need to travel by train to work
b) the villages must not be taken out of the Green Belt, this is too precious to lose. I hope the council will look at the plan again, and take these considerations into account.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/625  Respondent: 15147457 / Penny Battes  Agent:</th>
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<tr>
<td><strong>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</strong></td>
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I was horrified to read when I was in Ripley yesterday that there is a plan afoot to create a massive amount of new homes in the Guildford Borough. Although we do not live in the Borough, we frequently visit Ripley, Send and Clandon and so appreciate these lovely ancient villages. As a family we are all too aware that new homes have to be built to accommodate an ever increasing population BUT there must be other sites that would not ruin our beloved villages. Once they are gone, they will never return and it is villages like these that make our country special.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Our objection is to the erosion of the Green Belt, lack of evidence for the alleged housing need numbers and lack of proposed provision for amenities such as schools and gp surgeries.

I send this e-mail on behalf of my mother, my husband and myself and hope very much that our views will be taken into consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/636   Respondent: 15147617 / Patrick Fossett   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to register my objections to the present plans for development in the Ripley/Send/Wisley area. There are many reasons for this but the principal ones are overcrowding, traffic flows on local and trunk roads and removal of land from the green belt.

If you need more details I will be happy to write several pages, but I expect that this simple mail will suffice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp173/786   Respondent: 15147809 / Elmbridge Borough Council (Suzanne Parkes)   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Appendix C – Infrastructure Schedule

Following the removal of Table 1 and the recognition with the Local Plan that the strategic development sites are likely to be delivered during the 6-10 and 11-15 periods, the delivered when dates as set out in the appendix need to be consistent with this. For example, PED2 still refers to Years 1-15.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Appendix C – Infrastructure Schedule

Following the removal of Table 1 and the recognition with the Local Plan that the strategic development sites are likely to be delivered during the 6-10 and 11-15 periods, the delivered when dates as set out in the appendix need to be consistent with this. For example, PED2 still refers to Years 1-15.

Attached documents:

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Comment ID: pslp172/5439   Respondent: 15147809 / Elmbridge Borough Council (Suzanne Parkes)   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A35 – Land at Former Wisley Airfield, Ockham

In regards to the proposed new settlement at Wisley (Policy A35) it is acknowledged that there are two amendments to the site’s boundary. In regard to the first amendment it is understood that additional land is being added that was previously not considered available for allocation / development. Whilst there is no objection to the land being added per se, it is queried whether the identified capacity of the site should be amended to reflect the additional land now included. Should the potential capacity of the site change consideration should also be given to an additional impact on infrastructure requirements that would need to be included within the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1315  Respondent: 15147809 / Elmbridge Borough Council (Suzanne Parkes)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy ID1 – Infrastructure and delivery

Clarification is sort as to the interaction of points 3, 4 and 4 of this Policy. Points 3 and 5 relate specifically to planning applications with Point 3 stating that if the provision of infrastructure necessary to support new development cannot be secured, planning permission will be refused. However, this appears to be contradicted in Point 5 where it is suggested that regard will be had to the delivery and timing of delivery of the key infrastructure but does not necessarily constitute a refusal. The difference appears to be reference to ‘key infrastructure’. However, given the significance of the timely delivery of key infrastructure this point is considered to be even more pertinent.

It is also considered that the Policy would read better if the planning application and Local Plan elements were more clearly distinguished.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1305  Respondent: 15147809 / Elmbridge Borough Council (Suzanne Parkes)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**Guildford borough Proposed Submission Local Plan: strategy and sites (June 2017)**

Thank you for consulting Elmbridge Borough Council on Guildford Borough’s Proposed Submission Local Plan.

As you know, we are keen to work with you and other authorities within our respective areas to ensure the effectiveness of Local Plans including, ensuring that the best and most suitable sites are brought forward for development and that other cross-boundary and strategic planning matters are continuously addressed.

Given the focused nature of this latest consultation, this response is made at an officer level. As requested comments made in response to the previous Regulation 19 Consultation (June 2016) have not been repeated unless, they extend to any amendments now being proposed.

**Policy S2 – Planning or the Borough – our spatial development strategy**

It is acknowledged that the Proposed Submission Local Plan seeks to meet a revised housing need of at least 12,426 new homes between the amended period of 2015 and 2034. This is on the basis of the evidence contained within the West Surrey SHMA Guildford Addendum Report 2017. The number of new homes to be provided represents a decrease of 1,434 homes from that set out within the previous Proposed Submission Plan for which Guildford Borough Council proposed to meet.

It is understood that the land previously identified to accommodate the higher housing number has been revisited (Land Availability Assessment (LAA) and 2017 addendum). Notwithstanding the comments made in the document, it is considered that as this land was once identified as being available and developable it should be reconsidered and the potential for it to assist in meeting the unmet need across the housing market areas revisited.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPA16/1342  **Respondent:** 15147841 / N Golbengian  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**I object to the proposed Infrastructure Schedule (Appendix C)**

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Ripley I object to remove Ripley and send from green belt I object the allocation of land wisely air field , Garlicks arch , gosden hill , it will have terrible impact to local village I object to unbalanced allocation of development I object to development of any further trunk roads I object to further development of roads which adds to congestion already present in our roads I object to have more traffic trying to squeeze in our narrow roads I object to poor air quality follows more traffic I object to the lack of planing and implementation of infrastructure I object to the development of Garlicks arch for lack of utilities capacity in Ripley and send Parking issues in the villages is already serious I object to the planning due to further stress it will put on the health services I object to the planning due to stretching policing services Stress on local welfare There will be lack of protection of the environment

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
** I object to the inclusion of the land at Garlicks Arch, Send Marsh/Burnt Common and Ripley (A43).

Garlick's Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the Draft Local Plan Infrastructure schedule does not provide for this site at all.

** What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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** I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

** What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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** I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

** What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
** I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5329  Respondent: 15147841 / N Golbengian  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5330  Respondent: 15147841 / N Golbengian  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the lack of proper infrastructure planning for sites (Policy I1)

The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5331  Respondent: 15147841 / N Golbengian  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2
** I object to the congestion that development will cause to the trunk roads A3/M25 (Policy12)

Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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** I object to poor air quality concerns (Policy 13)

The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

** I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the 2016 draft local plan for the following reasons:

** I object to the local plan as the development proposed is not sustainable (Policy S1)

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

** I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the proposed development at Garlick’s Arch in Burnt Common. There is no need to additional houses in the borough on top of those already proposed. This site is new and has not been previously consulted on. The proposed new 4-way interchange onto the A3 at Burnt Common would be disastrous for Send. The road through send (A247) would be completely gridlocked during rush hours and would result in far too much fast moving traffic cutting through the village. It is already dangerous for children getting to school with the volume of fast moving traffic that don’t slow down by the school having left the A3. We cannot afford more traffic moving through the village and endangering our children.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have the following comments:

- I object to Send being removed the GreenBelt. Send is a small village that cannot take any more housing, the infrastructure & road systems are barely suitable for the current number of people and definitely cannot support more housing. I particularly object to the land between the 2 schools, including their playfields being taken out of the greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/244  Respondent: 15147937 / julie rae  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to Send being removed the GreenBelt. Send is a small village that cannot take any more housing, the infrastructure & road systems are barely suitable for the current number of people and definitely cannot support more housing. I particularly object to the land between the 2 schools, including their playfields being taken out of the greenbelt.

- I object to the proposed development at Garlick’s Arch in Burnt Common. There is no need to additional houses in the borough on top of those already proposed. This site is new and has not been previously consulted on. The proposed new 4-way interchange onto the A3 at Burnt Common would be disastrous for Send. The road through send (A247) would be completely gridlocked during rush hours and would result in far too much fast moving traffic cutting through the village. It is already dangerous for children getting to school with the volume of fast moving traffic that don’t slow down by the school having left the A3. We cannot afford more traffic moving through the village and endangering our children.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/199  Respondent: 15148129 / J Golbengian  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
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<th>Respondent: 15148193 / Ann West</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td>I support the policy of keeping this land for Allotment Use. An important space.</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</tbody>
</table>
We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt increase tail back son the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/647  Respondent: 15148705 / Catriona Wilkinson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In addition I object to Policy A43 Garlick’s Arch, as the proposal to build at least 400 homes and industrial facilities will not only put impossible pressure on the existing road network, but other infrastructure such as schools and medical facilities will be insufficient to support this development. The Villages Medical Centre in Send is already at capacity and there is no secondary school proposed for Ripley and Send which even now causes problems for many children who are unable to get in to the already oversubscribed closest secondary school George Abbot in Burpham.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/646  Respondent: 15148705 / Catriona Wilkinson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In particular I object to the following proposed sites:
Policy A43 Garlick’s Arch;
Policy A25 Gosden Hill Farm Merrow;
Policy A35 Wisley
The combined effect of these substantial proposed developments within close proximity will place an unsustainable burden on the infrastructure of the areas affected. The surrounding roads are already extremely busy and in particular the resulting increase in traffic on the A3 and M25 will be disastrous. The A3 is already at a near standstill on the approach to the M25 during the morning peak time and this will become substantially worse by the construction of upwards of four and a half thousand houses, plus commercial/industrial units on these three sites combined.

I object to the proposal to create a four way junction on the A3 at Burnt Common (Policy 43A) by extending north and south access as this will increase traffic enormously on the A247 which is already at full capacity through Send at peak times and experiences huge traffic jams when even minor road works are required along its length. The proposal will also increase the volume of traffic on the A247 through West Clandon which is totally unsuitable for any significant volume of HGV traffic due to a very narrow stretch within the village where two large vehicles are unable to pass each other.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/648  Respondent: 15148705 / Catriona Wilkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object to the proposal to remove Ripley, Wisley, Clandon, Send and other villages from the Green Belt as this will open up these villages to even more excessive development and will destroy much of the existing open landscape and countryside, potentially creating a continuous urban development from the M25 down to the A31 Hogs Back.

Please submit these comments and objections to the Planning Inspector for consideration as part of the Local Plan examination.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/645  Respondent: 15148705 / Catriona Wilkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the 2016 Draft Local Plan on the grounds that:

- the proposed development is disproportionate to the capacity of the area affected to accommodate it
- amounts to an excessive development within one area of the Borough and
- is contrary to the Borough’s stated objective of ‘balancing the needs of residents with protecting the borough’s most important countryside, landscape and heritage’.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/245  Respondent: 15148705 / Catriona Wilkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object to Policy A43 Garlick’s Arch as this substantial development was included in the Draft Local Plan at the last minute with less than two weeks’ notice and insufficient consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/691  Respondent: 15148705 / Catriona Wilkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 2017 Draft Local Plan on the grounds that:

- With regard to development proposals for the Send area, despite thousands of objections to the 2016 Draft Local Plan, these objections have been largely ignored by Guildford Borough Council. Instead of mitigating the effect of their original proposals, the Council have now proposed additional development in Policy Areas A42, A43 and A58.
- The proposed development within the Send area comprises 40% of the entire proposed development in the Draft Local Plan. How can this be acceptable when our area represents only 11% of the Borough? This amounts to a massive overdevelopment of one area, all on Green Belt land and with a disproportionately negative impact in an area where the infrastructure is already struggling to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The 2017 Draft Local Plan now proposes an increase in the development envisaged in the 2016 Draft Local Plan. 60 homes are now planned in place of the 45 homes originally proposed—an increase of one third. This completely ignores previous objections to the traffic problems which will be caused by this development on a site which is served by very narrow roads and the increase in the number of homes now proposed can only make matters worse. It will also increase the impact of surface water flooding which is already a problem in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Far from reducing the number of homes proposed for this site, the Council have again ignored substantial objections made regarding the impact of this site and have also added a proposal for 6 Travelling Showpeople plots. This despite there being no proven demand for this number of plots in this location. The proposals for this site are excessive, represent a substantial erosion of the Green Belt, and will generate huge amounts of traffic which the road system in Send and Ripley is completely unfit to cope with.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Again, despite numerous previous objections, the Council have now allocated this site for a minimum of 7,000 sq m of industrial space, instead of the previous maximum of 7,000 sq m, thereby creating the opportunity for unlimited development on this site in the future. These proposals are an unnecessary and inappropriate development within the Green Belt and will only increase the existing traffic gridlock in this area.

It is particularly disappointing that Guildford Borough Council have made so little attempt to address the genuine concerns of the Send community and that the proposals in the current draft Local Plan if implemented would actually have an even worse impact on the community than the 2016 proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/275  Respondent: 15148769 / Jeffrey Bayton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tail back son the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/278  Respondent: 15148929 / Keith Westell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to strongly object to the “new” local plan. As far as I can tell, there is nothing ‘new’ regarding this plan so far as West Horsley and the Wisley Airfield development proposals are concerned.

It has been my long-held belief that GBC have continuously targeted West Horsley as a key development site – and we have done well to resist such continuous development attacks on our village and the surrounding area. Yet again, GBC want to remove West Horsley formally from the Green belt; develop over 500 new homes and support a ‘new town’ build on the Wisley Airfield – less than 2 miles from the West Horsley boundary.

This area cannot sustain such large-scale development. Its infrastructure is still Victorian in it capability. Plumbing; pipes; road width; flood defences all point to a bygone time of the 1920’s. Two lorries on Ockham Road North travelling in opposite directions cause havoc. They simply cannot pass without mounting pavements and crashing continuously into the railway bridge, which happens approx. 3 times a year.

Schools cannot cope with existing demand, neither can the 1 Doctors surgery.

The railway station and parking and pick-up/drop-off routines will be interesting with, possibly, the addition of 1,000 extra cars and 2000 commuters.

The road quality in the area now mirrors Beirut on a bad day back in troubled times.

The absolutely baffling thing to me is the fact GBC are clearly taking a well-trodden path and a ‘line of least resistance’ in regurgitating these well-worn proposals. The lack of imaginative research to accommodate the genuine housing need on existing brown-field sites in the wider area is startling in its incapability; willingness and desire to plan effectively within the Borough. The political manoeuvrings to eliminate any real powerful say of the elected Guildford Greenbelt Group from
any Committee of meaning and the exclusion of this elected Group of Councillors from any real debate shows a complete
disrespect to us, the Public you are supposed to serve.

The scale of your development proposals in the Horsley area and Wisley beggars belief and demonstrates a level of disdain
of previous very public objections.

You should hang your heads in shame GBC.

Your Local Plan from a Horsley and Wisley perspective is a complete disaster. Over 500 proposed new homes and 2,000 in
a new town build within 2 miles is a recipe for disaster for the area. An area you have clearly wanted out of the Green Belt
for the last 24 years we have lived here.

Your previous deceit; arrogance and utter disdain of the wishes of the people who live in this area over that time borders on
a campaign of ruthless arrogance. A vote of ‘no confidence’ in you; the Local Plan and the architects of such nonsense is
long overdue.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/654  Respondent: 15150433 / Alex Richardson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

b) Proposed creation of new north & southbound slip roads to and from the A3 to the A247 Clandon Road (Policy A43A)
at Burnt Common. This is totally unacceptable and will destroy the village, surrounding area and quality of life.

c) Infrastructure – There are not enough primary and secondary school places as it is for the residents of Send and Ripley.
What proposals are in place for school paces for an extra 400 + children at least, not just for the immediate future but the
next 5/10/15 years? If this proposal is pushed through then new schools will need to be built concurrent to the proposed
housing, otherwise there will be serious issues for residents. It is also virtually impossible to get to see a doctor at The
Villages Medical Centre – not only can you never get through on the phone, but when you can you not get an appointment.
They cannot cope with the volume of residents without hundreds or potentially thousands of additional residents – and their
children etc.

I strongly object to these proposed developments and also to the lack of consideration given to the residents and their
concerns, the limited consultation period and the lack of planning for the adverse effects on infrastructure these
developments will have on the surrounding area. Please take on board the fears and concerns of your local residents, these
proposals will kill our village and the wider area. If these proposals are followed through there is no hope for this area or
our county as a whole, little by little the green belt will be destroyed and we will eventually become a suburb of London
with no country side, no wildlife and no way of ever getting back what we have lost.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
2) Size and Location of the Proposed Development at Garlick’s Arch -

I strongly object to the development, which is large for the area, with over 400 houses proposed, which would have a massive impact on the local villages infrastructure as follows:

1. a) Traffic / Congestion – Send and Ripley are massively impacted by their location to the A3/M25. It is almost impossible some mornings to get out of the top of our road (we live in Chestnut Close) – trying to turn right onto Portsmouth Road is not only difficult it is also dangerous during rush hour. From 7.30 onwards during morning rush hour there is a queue of traffic from the junction of Portsmouth Road and Send Marsh Road, going down past Linden Way and all the way back past the Saddlers Arms, often as far as the green. It also queues at Mays Corner / Send Crossroads, up past send First School to the roundabout, and going the other way towards Woking. This is the situation on a normal day. If there is an accident on the A3 or the M25 or roadworks or any kind of adverse weather or other problem the situation is ten times worse! (we suggest a traffic survey team would be advised to monitor for themselves). If you build 400 houses and an industrial site, in this area, the congestion it would cause with at least 400 extra cars on the road would be phenomenal. Further to this the detrimental impact of pollution in this area. And not to mention the impact of these extra cars speeding up and down Send Barns Lane past the school – which already is dangerous as there is no crossing. If you factor in a further 2000 homes still proposed in the local plan at Wisley (despite earlier rejection by Guildford Borough Council), along with proposals for 2200 homes at Clandon/Burpham – these proposals will create MASSIVE further traffic problems and congestion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I write with reference to the proposed development on Green Belt Land of 400 houses and an industrial site at Garlicks Arch – Burnt Common Send Ripley Borders which has been drafted into the Guildford Local Plan 2016. I would like to register my objection to this proposed development for the following reasons:

1) Erosion of the Green Belt –

I strongly object to proposed wholesale destruction of the Green Belt, which is in clear contravention of the central governments stated commitment for “Green Belt Protection”. Once this area is developed not only will this part of the...
Green Belt be eroded, but it will set a precedent for future development and erosion of the green belt – not only in Send/Ripley and Clandon villages but on other green belt sites within Guildford & surrounding areas. The Green Belt should and must be protected, and whilst I appreciate the need for more housing in Guildford, there are plenty of brownfield sites which can be redeveloped. Also, it is alarming that not only is housing proposed on the greenbelt, but also an industrial site – which will have a huge & negative impact on the surrounding environment e.g. pollution, long term damage to the surrounding countryside and the flora/fauna within this area, not to mention the negative effect on communities currently living in these areas.

Furthermore, I also object to the proposed removal, through “in-setting”, of several villages from the Green Belt (eg Send, Ripley, Send, Clandon and Wisley to name a few).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/294   Respondent: 15150465 / L Williams   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt increase tail back son the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12880   Respondent: 15150465 / L Williams   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I was born in Guildford and view with horror the plans proposed to build so many extra houses. The congestion at present brings traffic to a standstill. I can't imagine what it would be like with so many extra houses and cars. The hospitals, schools, doctors, and surgeries would be pushed to the limit. I hope these problems can be sorted and we can continue to have a pleasant town to live in for the future. JUDY NETTO.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12869  Respondent: 15150465 / L Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have viewed your plans for future development of Guildford with horror and beseech you to realise the damage that will occur to our lovely city environment should the expansion plan go ahead. The amenity of so much beautiful countryside surrounding Guildford would vanish, traffic would be much worse than it is at present, local services would be totally overloaded, i.e., doctors, hospital, surgeries, etc. Please, please reconsider.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/206  Respondent: 15150593 / Janna McClean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The complete lack of evidence of housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/659  Respondent: 15150593 / Janna McClean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Lack of provision for new schools .
2. Lack of provision for Doctors surgeries.
3. The inclusion of the rejected Wisley plan from the Cayman Island Company.
4. I voted for a conservative Guildford Council and did expect this breach of trust in the complete decimation of the Green Belt.
5. As all of us who are resident in the area know only too well the total infrastructure is already at breaking point, roads rail schools.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/657  Respondent: 15150593 / Janna McClean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Planning Policy Committee.

I am writing to strongly object to the proposed 2016 draft plan for the following reasons.

1. The erosion of the green belt , which directly goes against Conservative policy 2. Any insetting of any villages in the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/658  Respondent: 15150593 / Janna McClean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
3. The disproportionate amount of development in one area of the borough

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The outrageously limited consultation period.
2. The disgraceful last minute inclusion of new sites with less than three weeks notice?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have particularly strong objections to the Bell and Colvill proposed site - to fit 40 houses in such a small space seems impossible and will have a real impact on the surrounding area, traffic etc. We live at [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998], almost opposite the garage and are wholly opposed to this development. I am also concerned about the deflationary impact on house prices.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/664</th>
<th>Respondent: 15150785 / Natasha Dillon</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
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I am writing to formally object to the local plan published on 6th June for the following reasons:

- The proposal to remove some of the village areas inside of the boundaries from the green belt will have devastating consequences for the quality of village life, the natural beauty we are surrounded by, wildlife and the environment overall.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/665</th>
<th>Respondent: 15150785 / Natasha Dillon</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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I am writing to formally object to the local plan published on 6th June for the following reasons:

- We do not have the infrastructure to support the new developments e.g. medical centres, dentists, schools etc. - there are already insufficient places at the Raleigh school to service the Horsleys - adding up to another 533 houses will create real problems.

- Any increase in housing would result in insufficient parking at Horsley station which would be a daily inconvenience for a number of existing residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/1050</th>
<th>Respondent: 15150817 / Robert Winborn</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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10) I OBJECT TO lack of evidence to the need for more housing in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1600  Respondent: 15150817 / Robert Winborn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5) I OBJECT TO Site A25 Gosden Hill Farm. How can you warrant 2000 homes being built in the Green Belt, massive implications to the surrounding area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1601  Respondent: 15150817 / Robert Winborn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6) I OBJECT TO Site A35 Wisley Airfield. The development of 2000 homes are unsustainable and totally inappropriate in the Green Belt Area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1596  Respondent: 15150817 / Robert Winborn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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<th>Comment ID: PSLPS16/1598</th>
<th>Respondent: 15150817 / Robert Winborn</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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2) I OBJECT TO site A43 Garlicks Arch included at a later stage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/1599</th>
<th>Respondent: 15150817 / Robert Winborn</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45</td>
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3) I OBJECT TO the on and off ramp at site A43a Burnt Common/Clandon Road this will cause the traffic to be railroaded through the villages and result in increased traffic problems not help them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/1602</th>
<th>Respondent: 15150817 / Robert Winborn</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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4) I OBJECT TO Site A45 the Talbot. This is a conservation area and will cause over development in an area that does not need it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7) I OBJECT TO Site A57 The Paddocks. Four!!!! traveller pitches are totally out of the question.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/3555</th>
<th>Respondent: 15150817 / Robert Winborn</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

9) I OBJECT TO the development of so many houses in one area of the Borough, schools Public Services medical facilities are stretched cannot take any increase.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/3554</th>
<th>Respondent: 15150817 / Robert Winborn</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8) I OBJECT TO the removal of any villages from the Green Belt i.e in-setting. When will this stop, will have no green spaces left.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/3547 | Respondent: 15150817 / Robert Winborn | Agent: |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please read and take note of my OBJECTIONS to all of the points listed below,

1) I OBJECT TO the local Plan Policy S1, the development planned is in no way sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/208  Respondent: 15150849 / Henny van Dongen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing you because of the New Local Plan involving the village I live, East Horsley.

We, my husband, son and I, moved here only recently for work in London City. We chose this area because it was located at the base of the Surrey Hills, an area of outstanding beauty. Only after we moved here we learned about the plans involving the building of new houses and the plan to change the status of the village we live in.

We believe building new houses should involve the improvement of the infrastructure. Only last week, with Green Dene closed and after a night of heavy rainfall, travel times plummeted. However, building and improving infrastructure would have a great impact on nature and the experience of nature. Changing the green belt status to a 'village' status, would shift the focus from persevering nature to urbanization, a shift undesirable.

Does the demand for houses justify the building of new houses? We noticed that there are a lot of houses for sale or to let in the area.

We may be passers by, as my surname may bear witness to, but we thought this of too much importance not to let our voice be heard.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/216  Respondent: 15150913 / Peter Hamilton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
1. The failure of GBC to provide sound evidence in terms of the Employment Land Needs Assessment 2015 (ELNA) which shows an 80% reduction in employment space from the previous ELNA carried out by GBC in 2013. This means that industrial space at Burnt Common is no longer needed. Housing numbers from the Strategic Housing Market Assessment 2015 (SHMA) are highly questionable. The number of foreign students has been wrongly used to inflate the need. The required 13,860 homes in the Local Plan is exaggerated. If the population is to grow by some 20,000 in the Plan period, 8,000 homes would be needed based on an average of 2.5 persons per home. The Green Belt does not need to be built over and half of new homes could be built on brownfield sites. It appears that GBC’s Transport Assessment was not even available to councillors for the vote taken on 24th May and this was only published on 6th June with infrastructure overload receiving scant attention.

None of these proposals are in the best interests of Send and its residents and any change to its Green Belt status would greatly diminish the character and identity of the village. In addition, the general strain on the infrastructure of the village in terms of roads, schooling and medical services would be overwhelming. Already in Send, traffic is heavy at certain times of day, schools over-subscribed and The Villages Medical Centre struggles to provide timely appointments for the residents currently registered.

I trust these objections are received and noted in accordance with procedure and look forward to news arising from the reassessment which will surely be necessary once the full extent of the resistance of local residents to the Local Plan proposals is known to GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/215  Respondent: 15150913 / Peter Hamilton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I refer to the revised Local plan approved by the full council at the extraordinary meeting of 24th May.

Please take due and formal note that I OBJECT to all of the following:

1. The number of homes that the Plan intends to deliver.
2. The enclosure of protected Green Belt within the proposed new village boundaries (for which there will be a presumption for development in the future).
3. The Garlick’s Arch (Policy A43) proposal to build 400 houses and 7,000 square metres of light / general industrial / storage distribution space on the Green Belt.
4. The creation of new north and southbound slip roads to and from the A3 to the A247 Clandon Road (Policy A43A) at Burnt Common. This would be disastrous for Send as it would create gridlock on Send Road (A247) in the core hours of the day. Send would become the through route to Woking for traffic leaving the M25 and A3 as
well as for vehicles coming from proposed housing developments in Wisley and Burpham (2,000 houses in each case).

5. The wholesale destruction of the Green Belt in this area (including the planned development of 2,000 homes at Gosden Hill Farm, Merrow – Policy A25) in clear contravention of the central government’s stated commitment to Green Belt protection.

6. The designation of land wet of Winds Ridge and Send Hill for 40 homes and 2 Travellers’ Pitches. This site is NEW and was NOT included in the regulation 18 draft and has NOT been consulted upon previously. This is a permanent Green Belt site within an area of beautiful countryside which would be spoiled by development. Also, the subsoil contains documented unsafe land fill waste which is currently vented. The narrow width single track country lane providing access to the site is totally inadequate for and inappropriate to usage by Traveller settlements.

7. The removal of Send from the Green Belt.

8. The failure of Guildford Borough Council (GBC) to follow due and correct process. Since 2014, GBC has changed the plans for every major site in Send proposed for development and now seeks to add a massive new road junction. The 2014 proposal for 430 houses reduced to 185 in April 2016 and now shoots up to 485. These significant changes require full consultation under Regulation 18, not the Regulation 10 short cut which GBC seek to get away with. This action appears to invalidate the whole process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/666  Respondent: 15150913 / Peter Hamilton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The failure of GBC to provide sound evidence in terms of the Employment Land Needs Assessment 2015 (ELNA) which shows an 80% reduction in employment space from the previous ELNA carried out by GBC in 2013. This means that industrial space at Burnt Common is no longer needed. Housing numbers from the Strategic Housing Market Assessment 2015 (SHMA) are highly questionable. The number of foreign students has been wrongly used to inflate the need. The required 13,860 hoses in the Local Plan is exaggerated. If the population is to grow by some 20,000 in the Plan period, 8,000 homes would be needed based on an average of 2.5 persons per home. The Green Belt does not need to be built over and half of new homes could be built on brownfield sites. It appears that GBC’s Transport Assessment was not even available to councillors for the vote taken on 24th May and this was only published on 6th June with infrastructure overload receiving scant attention. None of these proposals are in the best interests of Send and its residents and any change to its Green Belt status would greatly diminish the character and identity of the village. In addition, the general strain on the infrastructure of the village in terms of roads, schooling and medical services would be overwhelming. Already in Send, traffic is heavy at certain times of day, schools over-subscribed and The Villages Medical Centre struggles to provide timely appointments for the residents currently registered. I trust these objections are received and noted in accordance with procedure and look forward to news arising from the reassessment which will surely be necessary once the full extent of the resistance of local residents to the Local Plan proposals is known to GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Housing

1.1. The target for new homes outlined in the Local Plan represents a 25% increase in the housing stock of the borough; The Office of National Statistics ("ONS") projects a population increase (including that for economic growth) of some 15% for Guildford Borough over this same period. Why do we need the 25% increase in homes?.

1.2. The infrastructure proposals are inadequate even to meet existing needs let alone the proposed additional developments in the Local Plan.

1.3. Policy S2: is a Borough Wide Strategy (the “SHMA”), which looks at how the annual housing target of 693 homes is made up. It estimates that 517 homes per annum arise from ‘the demographic figure (supported by ONS office national statistics) projections. To this GBC plan has added another 120 homes per annum in order to ‘support extraeconomic growth’, a further 31 homes per annum to ‘improve affordability’ and 25 homes due to ‘student growth’, all of which totals up to 693 homes per annum target more than in the rejected plan.

1.4. This does not make any sense as we do not need an uplift for extra economic growth. Current growth patterns are included in ONS projection.

1.5. The increase of 25 homes to ease affordability issues will result in only 10 social/affordable houses being built. It would be better if planning permission was only granted for 1, 2, 3 bed properties for a period of 2 - 3 years with a restriction on the percentage of 4 & 5 bed if required. This would help to provide a better mix for both market and affordable homes in all parts of the borough.

1.6. Student accommodation should be provided by the university. The University’s expansion should be in line with what it can deliver in terms of extra student accommodation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/210  Respondent: 15151009 / G Stonehouse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **Wisley Airfield**

3.1. The proposal to include this site in the Local Plan and remove it from the green belt is puzzling as it was the subject of a planning application refusal in recent months.

3.2. The reason given for the refusal was because the site was within the Green Belt. So why do that when GBC had the clear intention of moving the site out of the Green Belt within next few weeks? There were other reasons that were glossed over in the report that are not resolved by GBC recent actions. The impact on infrastructure, which is clear for all to see, only gets a passing mention. For example, the transport report by the developer's consultants has been torn apart following many comments and objections. Missing traffic numbers, grossly understating the impact of the development on trunk roads and local roads. The information provided in the Local Plan implies that if billions are spent on road and transport network improvement the development at Wisley could proceed with improvements funded by developers.

3.3. There appear to be 58 projects included in GBC wish list; statements have been made that for the housing program to move forward, it would require the majority of the programme of work to be delivered. At this point in time only 4 of the 58 projects have received committed funding even one of these is in doubt if Highways England is to be believed.

3.4. No solutions have been arrived at for the problems in the centre of Ripley. After more than 2 years of meetings and discussions involving SCC and the developer's consultants no workable solution has been identified. GBC local plan dismisses this significant problem saying it will be resolved with a "management solution". I would be very interested to hear what that solution could be and I suspect SCC highways would also be interested.

3.5. Both Highways England and SCC Highways issued holding objections in relation to the recent planning application for the Wisley site. This is, apparently, all they can now do as they are unable to refuse an application. If these two key agencies have expressed their grave reservation over the potential development on this site, why do GBC insist in promoting the site?

3.6. Under the latest Housing and Planning Bill, if sites are included in a local plan there is a presumption in favour of an application with matters of detail only to be resolved. Large slices of GBC traffic solutions are based on survey and analysis yet to be done when more detail can be made available. In other words they do not know the full extent of the problem. This information will be the result of a further examination of the issues and with solutions that are not currently apparent. I suppose this is the reason for the vagaries of the budgets. The only beneficiary of such an ill conceived and ill prepared approach will be lawyers representing the future developers when they are asked to pay for or contribute towards any mitigation.

3.7. The budget costings are said to err on the conservative side. Worked out on the back of a fag packet is more the case! How can anybody be expected to take a budget plan seriously when the individual projects have a budget plan estimate in the range of £100m to £250m on a single project. It is no wonder only 4 of the 58 projects have any commitment.

3.8. There are serious environment issues on the Wisley site and the nearby SPA. Pollution levels already exceed EU levels. The proposed SANG provision is immediately adjacent to the SPA a point that was criticized by Wildlife Trust, and Forestry Commission and initially by Natural England. The latter making a reversal of earlier comments following changes in personnel.

3.9. I therefore Object to the Wisley Airfield site being taken out of the Green Belt where it continues to serve the purposes intended by its original inclusion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/667  **Respondent:** 15151009 / G Stonehouse **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.7. GBC Affordable Housing Policy H2 is proposing that all development sites (other than those with less than 10 units) will be required to have 40% of their homes offered as affordable housing. This to be on all site irrespective of where they are or where the homes are most needed. Local authorities are able to take payments in lieu from developers, but GBC have rejected this option. Why? This “one size fit all” policy will mean that homes will be built where they are not needed and not enough will be built where they are needed. Developers are therefore able to influence the level and type of affordable homes built. The housing mix in the Local Plan suggests more 1-bed homes should be built than 2-bed. GBC have ignored the figures from their own needs data (where more 2-bed homes are needed) in favour of those produced by their external consultants report. These reports have been influenced not by sound internal data from their housing records but by the vested interests of the development lobby. The only changes that can be made to the number on each site is at the developers discretion and at their request. GBC are unable to promote changes.

1.8. If any affordable social housing is built in a village like East Horsley and on most of the sites in West Horsley they could be lost to the market as there is no rural protection against the right to buy or enfranchise.

1.9. Most of the social housing in EH has already been lost as a result of right to buy, GBC should take payment in lieu from developers and build the social affordable home in more urban areas where they are most needed.

1.10. GBC’s new policies will encourage the buy to let investors who will receive a good return on their investment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/668  Respondent: 15151009 / G Stonehouse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.11. POLICY H3: Rural exception homes are required on a small scale and can be retained as affordable and built on the edge of village and have significantly less impact on the Green Belt.

1.12. I therefore object to the proposed housing numbers and policies based on the above points.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/669  Respondent: 15151009 / G Stonehouse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Green Belt

2.1. Proposed Submission Local Plan includes the statement “We will continue to protect the Metropolitan Green Belt”. No this is not the case. The housing policies set out in the Proposed Submission Local Plan; indicate that 65% of proposed new developments will take place on land that is currently in the Green Belt.

2.2. Under NPPF regulations GBC and other Local Authorities are permitted, once they have determined their Objectively Assessed housing Need (OAN), to make allowance for factors which may constrain the delivery of new housing. Constraints such as the need to protect the Metropolitan Green Belt, or the restrictions required to protect the Surrey Hills Area of Outstanding Natural Beauty, or land costs etc. Although these designated areas make up a large proportion of the land area of Guildford Borough, GBC has made no attempt to reduce its housing numbers in order to take account of such constraints. They have instead increased the number, beyond that required for normal growth projections to satisfy their own egotistical view on a path of massive economic growth.

2.3. Currently development is permitted within the settlement boundary, where villages are washed over by the green belt with particular planning regimes being applicable that have proved beneficial in preventing the urbanization of many villages. They are very successful, because of the non urban nature of small scale new development to help to retain the openness of the villages. These villages house, in some cases, a population of 4000 plus people, yet are regarded by residents as small villages. For those who drive through these areas they do not see a mass of urban style developments but trees and hedges, views between homes, views through spaces that don’t reveal row upon row of homes but space and openness with trees amongst the homes and a variety of scale and architecture.

2.4. Washing some of the larger villages will result in them becoming their own urban sprawl as a result of disproportionate infilling.

2.5. Changes to settlement boundaries have been made in order to make more land available for the developers under the guise of making the boundaries more defensible. Many straight lines have now been drawn which result in villages developing hard edge profiles with buildings replacing the fragmented softer edge of the original hedgerows, trees and green fields.

2.6. Loss of Green Belt resulting from these boundary realignments can only be justified in exceptional circumstance. None of which have been provided. Moving a boundary from one already defined boundary to another, again can only be done in exceptional circumstance. Housing need has already been turned down as such an exceptional circumstance.

2.7. I object to all these changes being made to the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to:
1) New houses in the Green Belt.
2) Increase in settlement area of East Horsley by 37%
3) New housing at East Horsley station and at the Wisley airfield
4) Insetting of East Horsley from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/217  Respondent: 15153569 / Christopher Slinn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send Marsh/ Burnt Common

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1) I object to the junction with the A3 at Burnt Common not being built until several years after the housing development. The transport infrastructure should be fixed before development starts.

2) I object to the totally inadequate budget for road improvements. Noise and air pollution is already bad. I believe there are new forms of Tarmac that reduce road noise.

3) I object to the poor transport plan. There is already gridlock frequently through Ripley, Send and Clandon.

4) I object to the erosion of the Green Belt.

5) I object to the disproportionate amount of development in one area of the Borough.

6) I object to the last minute inclusion of new sites with less than 2 weeks notice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/444  Respondent: 15153569 / Christopher Slinn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43 change at Garlick’s Arch because:
- It will cause over development of our village and the number of homes is excessive
- It will join up Ripley and Send and defeat the key purpose of Green Belt
- It will generate excessive traffic that will block up local roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/445  Respondent: 15153569 / Christopher Slinn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A58 at Burnt Common because:
- There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
- The impact on small surrounding roads will create traffic gridlock
- It will join up existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/306  Respondent: 15153665 / Michael Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2074  Respondent: 15153665 / Michael Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/683  Respondent: 15153697 / Zena Singer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object most strongly to the Horsley villages being taken out of the Green Belt. Many promises have been made to preserve the Green Belt and it should be. It is a rural area and the character of the villages should be maintained.

The Horsley villages have already, during the last few years, had considerable infilling and large areas of new houses built resulting in considerable congestion on the narrow roads, particularly at peak times. It is already almost impossible to park to shop in the village, and the overflow car park is constantly full.

The station car park is also nearly full now, and with the additional houses planned commuters would not be able to park there.

The filter roads off the A3 already have huge tailbacks at peak times.

The proposed number of houses to be built would mean a huge strain on the infrastructure, and cause a different way of life for the residents who do not want this. The further possibility of development at Wisley airfield is a complete horror as it would ruin the areas of outstanding natural beauty all around it.

Please reconsider the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/311  Respondent: 15153921 / Janet Leila Humphries  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/314  Respondent: 15154145 / B Punter  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1761  Respondent: 15154145 / B Punter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat running through local roads
- Add to Guildford’s pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/313  Respondent: 15154177 / Rebecca Giordanengo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to record my objection to the planned local development A44.19ha

I live locally in [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] and my mother in law lives on Send Hill, I moved locally so I can look after my mother in law as she gets older - we moved to Send a few years ago as it is surrounded by a lot of greenbelt which is perfect for walks and running.

We purchased both properties after carefully selecting the area as village life is important, we did not expect a mass of houses to be built right behind my mother’s property and certainly do not approve of 'Travellors' being GIFTED land - we have both worked hard and paid a LOT in taxes over many years, [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it] I feel by allowing this plan to proceed you will place undue stress, fear which would be detrimental to my mother’s health.

There is plenty of land far more suitable near the 'Eubanks' auction house between the A3 and the slip road from the A3 towards Send.

Surely you can see the proposed plot A44 is not suitable or fair and therefore I strongly OBJECT to this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/362</th>
<th>Respondent:</th>
<th>15154209 / Lo (Chris Lenton)</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A46</td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Thank you for your time in reading this email in respect of the GBC draft local plan including the Normandy development proposals which include Site Allocation A46.

We attended the local meeting last Wednesday night in Normandy Village Hall to discuss the plan, which was very informative and helpful. Having considered the plan for Site Allocation A46, and the points discussed at the meeting, we have strong objections to the plan for Site Allocation A46, and as a starting point would make the observation that it just seems an extraordinarily complex and problematic plan to implement given all the environmental, transportation and other logistical issues that will need to be addressed to significantly increase the volume of people and traffic in Normandy.

We appreciate that houses are required and need to be built somewhere, but they need to be built somewhere appropriate, and from our perspective there are four obvious and fundamental issues concerning Normandy that need to be dealt with as a starting point, namely:
that surrounding schools are significantly under-subscribed so why is a new school required;
how are the already inadequate and busy roads going to cater for the increased volume of cars;
how is the impact on the protected and fragile local eco-systems going to be satisfactorily managed; and
how are the flooding issues that affect Normandy going to be sorted out.

Everyone will have their own personal issues and opinions in respect of all of the above and more, but we will just deal with the two issues that from our perspective just make the plans a non-starter regardless of anything else. This is not to say that we do not agree with and support other objections, but traffic and flooding are what we see on a daily basis.

Traffic

I work in Guildford and aim to leave at 7.30am every day and the absolute cut-off time for leaving is 7.45am. If I leave after that point then I will struggle to be at work for 8.30am. We are talking about a distance of 5 miles! The junction where I get on to the A323 is from Hunts Hill Road with Glaziers Lane directly opposite. By 7.45am there is a never ending stream of traffic going past that makes even turning left difficult. You have to take your chances and get out when you can, but at the same time you have the poor people trying to turn right from Glaziers Lane directly opposite, they just get stuck there, and sometimes you both pull out at the same time. It is dangerous and there is too much traffic already at this one junction.

My wife goes down to Petersfield so ideally she would cross the A323 from Hunts Hill Road to Glaziers Lane. She goes a bit later at about 8.15am and has given up trying to make that crossing, it is very dangerous, you wait for ages and when there is a gap in the traffic it is very unclear who has priority. She therefore goes in the opposite direction down Hunts Hill Road to Pirbright Road where she turns left and left again so that she can come to the end of School Lane and turn left and then right, all of which isn't very satisfactory.

Another question is how are the children at the big new school going to get to and from it? Given the traffic and lack of pavements they will not be able to cycle so presumably the majority will need to be driven increasing further the volume of traffic at the prime commuter times.

So, in a nutshell, there is already too much traffic. There have been big developments already around Ash that have flooded the roads with traffic with more proposed, and whilst the bullet point summary in the A46 schedule to the plan acknowledges the issue there are no proposals as to how this could be achieved, and we simply don't see what could be put in place from an infrastructure perspective to address the significant additional traffic volume that would result from the proposed developments in Normandy. It was mentioned in the meeting on Wednesday that the developer has set aside £3m to deal with the upgrading of the road infrastructure. Obviously this wouldn't go very far and simply highlights how little consideration has been given to this issue.

Flooding

The overnight rain on Wednesday night caused flooding all over Normandy, there was static water and large puddles on every road, it is dangerous and a real issue. This is the case every time there is a significant amount of rain, be it during the Summer or the Winter. It is difficult to see how the development could not affect the stream running through the designated area, so where will this water go? In my experience unless works are specifically being done to address flooding issues, big developments just exacerbate the problem because there is less land for the water to drain into and it deprives the locality of the natural water courses so the water will need to find a new course. Flooding is a known and very noticeable issue in Normandy and again it is difficult to see how the proposed development would not make the situation even worse, not only for the areas immediately surrounding the development but further afield too where we live and the main roads that are already prone to flooding. Whilst mention is made of the existing flooding issues in the bullet point summary in the A46 schedule to the plan, again there are no details of how this problem will be, or could be, addressed.

Moving away from the specific planning considerations we moved into Normandy itself fairly recently, but have lived in the general area most of our lives and it seems extraordinary that Normandy should be singled out as the obvious place for a development of this sort. It is one of the few villages that still has a genuine village feel with a community of residents who have lived there all their lives. Very different from other local areas such as Worplesdon where we have recently moved from which is mostly inhabited by people who have recently moved out of London down to Surrey, keep
themselves to themselves, and generally just view the village as a useful commuter base for London. This is why we moved here!

The saddest conversation we heard was at the Normandy May Fair. Two retired ladies who had lived in Normandy all their lives were discussing the proposals and were clearly just shocked and saddened by the whole proposal. If the development goes ahead it will deeply affect their whole way of life, as it will for hundreds of other people, and they just felt frustrated and utterly powerless. The Normandy May Fair includes May pole dancing, stalls selling bric-a-brac and a dog show that every dog in the village seemed to be involved in. It is difficult to see how such a quaint and relaxed village gathering, along with the many other social community events throughout the year, would survive in the same form following the imposition of up to 3,000 new people. It is our view that it would be completely inexcusable to impose over 1,000 new homes on a rural village in the greenbelt.

Obviously nobody wants a development in their back yard, and it is understandable that any people potentially affected by a development will react swiftly and with a huge element of self-interest. However we believe that Normandy is unique in being a genuine village community, and a close community that has been together for many generations. The reaction of a lot of the long term residents we have heard talk about it is one of bewilderment and sadness rather than anger and blatant self-interest, because they know what could be destroyed in terms of community and village spirit in addition to the worrying impact on the countryside and wildlife in the local and surrounding areas.

We understand that the decision rests in your hands so we would also ask that in addition to the more technical and legal arguments that will be thrown your way that you also just pause to consider the unique spirit of Normandy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/218  Respondent: 15154209 / Lo (Chris Lenton)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix II: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We were very pleased to see that the Normandy development proposals listed as Site Allocations A46 and A47 have been removed from the Plan, so thank you for that. It was impossible to see how these could be adequately serviced by the existing infrastructure. Just the increased road traffic and flooding issues alone resulting from the finished project would have made life a misery for everyone affected by it.

We are however concerned about a couple of points in the new plan as follows:

- **Removal from Green Belt of homes in Guildford Road, Glaziers lane, Flexford, etc and the new traveller site** – this seems like a prelude to making the building of new homes on these areas easier in the future. My daughter and I regularly cycle and run around these areas and we are very concerned about any attempt to any shrinking of the green belt.
- **10,000 new homes within 10 mile radius of Normandy** – whilst we are obviously glad that the direct impact of developing over a 1,000 homes in Normandy has been removed, the indirect effect on traffic increases, etc will need to be properly catered for in the form of improvements in road infrastructure. For example the level crossing in Ash already causes significant delays but if the traffic levels are increased considerably then this...
could become completely unmanageable, with the backlog only partially being cleared in between trains. Are there any plans to cater for this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/220  Respondent: 15154241 / Brendan Laing  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016). And these are my reasons:

1. I object to the number of houses needed. After the EU referendum I do not believe the proposed housing numbers are still valid. I would like to see a revision to these numbers for the Guildford Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/316  Respondent: 15154241 / Brendan Laing  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Wisley airfield being considered a brown field site. It is 95% green farm land, with a single strip of tarmac. Converting this beautiful area into a massive housing estate will result in a loss of natural habit for many British animals including wild deer.

1. I object to the size and scale of Wisley airfield development. It will create a massive disproportionate pressure on existing country and trunk roads. The Transport Plan does not properly satisfy the existing gridlock in Guildford and surrounding areas, let alone counter the proposed increase in traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/317  Respondent: 15154241 / Brendan Laing  Agent:
1. I object to the proposed development at Garlic's Arch. This is ancient woodland and farmland. There is no proportion to the scale development compared to the existing number of homes in Send Marsh, Burnt Common, and Ripley.

1. I also object to the proposed development at Garlic's Arch because it will create increased traffic issues, pressure on local doctors, and schooling. There is no local secondary school without rush hour bus or train journeys.

1. Last year I wrote to Guildford council for a kerb to be installed outside my house. The response that this is normal for villages in the countryside. I object to the basis on which the proposed plan is diverting from existing principles and proposing 400 homes within 2 minutes walk from my house!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/318  Respondent: 15154241 / Brendan Laing  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the building of new A3 slip roads on the Burnt Common junction. These ramps will not only provide access for an unnecessary new site, but will create alternative routes for congested M25 traffic. The proposed traffic plan includes a mere £1.5m to improve the traffic lights in Send, the village is already at standstill during rush hour due to the Old woking mini-roundabout.

1. I also object to the building of new A3 slip roads on the Burnt Common junction as this will increase traffic and damage air quality and congestion around the burnt common roundabout. The roundabout often is congested at peak times. It can take over 20 minutes to get to Clandon station from Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/689  Respondent: 15154241 / Brendan Laing  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
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<tbody>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>1. I object to the irreversible damage building new homes on woodland and farmland will create. A combination of brown field sites (burnt common) and small infill sites (Anderton’s Farm) are available but have not been considered by the plan.</td>
</tr>
<tr>
<td>1. I object to removing villages around Guildford (such as Ripley, Send and Clandon) from the green belt. Villages will be permanently damaged by uncontrolled development. I do not want these villages to become an extension of Greater London via spreading urbanisation. Villages are the culture and heritage of our country.</td>
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</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>1. I object to the building of homes without due thought for school journeys. These represent a large proportion of traffic during rush hours, and the dependency of our children on parents to ferry them around. We should encourage housing to be built near schools or new schools to be built so that children can travel short distances by green transport.</td>
</tr>
</tbody>
</table>

I wish these objections to be fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/690  Respondent: 15154241 / Brendan Laing  Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</tbody>
</table>
1. I object to the borough wide strategy. We should not be increasing our dependency of cars to move around by building greenbelt housing, and therefore we should be building housing near existing railway stations, or other green transport such as bikes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2616  Respondent: 15154241 / Brendan Laing  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43: Garlicks Arch

The site is allocated for approximately 400 homes (C3), including some self-build and custom house building plots, and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8)6 Travelling Showpeople plots (sui generis).

Policy H3: Rural exception homes

(1) Small affordable housing developments, including pitches for travellers, will be permitted to meet identified local affordable housing needs provided that:

(a) the site adjoins or is closely related to, and in safe and easy reasonable walking distance of a defined or a non-defined rural settlement, and

(b) the number, size and tenure of homes would be appropriate to meet, or to contribute to meeting, the identified local affordable housing needs of the local community

Policy A43a: Land for new north facing slip roads to/from A3 at Send Marsh/Burnt Common

>> I agree with the removal of industrial usage (A43) on greenbelt as per National Planning Policy, but object to the inclusion of Travelling Showpeople plots.

I continue to object to the inappropriate use of ancient GreenBelt land for 400 new houses (A43). This is not sufficient justification (H3) or exceptional circumstances. This is reckless destruction of green belt.

The argument in Policy H3 that it is ok to use green belt land for affordable housing if it is reasonable asking distance to a rural settlement is also not valid. Send is a good 60min walk, and Ripley 45min. This is unreasonable.

Furthermore the local Train station at Clandon is 60min walk. Furthermore the number and size of have no bearing on the needs of the local community! We have no need in Send, Ripley or Clandon for 400 new homes.

I continue to object to the need for a new slip road, especially since it has increased in size to 4.5ha and has no stated purpose or value. It will only lead to further congestion in and around our villages which are gridlocked daily.

I wish these objections to be fully taken into consideration and that the Updated Plan be amended accordingly.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1763  Respondent: 15154401 / Joan Grist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat running through local roads
- Add to Guildford’s pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/320  Respondent: 15154465 / Glen Harrington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to register my objection to the above plan. Development for housing is inappropriate due to its permanent Green Belt status. The sub soil of the site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is inappropriate due to the narrow width single track country road providing insufficient access to the site.

I therefore object to this proposal. Please ensure my comments are seen by the inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object because:

- the site was not included in the regulation 18 draft and the site has not been consulted on previously;

- it is currently Green Belt and building on the site will undermine Send’s village status;

- a new 4 way interchange onto the A3 would make Send a through route for traffic leaving the A3 and M25 for Woking, overloading the road through Send village. The A3 is a main artery through the borough but only works if the traffic is able to travel smoothly and is not interrupted by frequent junctions where traffic joining or leaving impede the flow causing a detrimental effect on the highway.

- proposed improvements to the A247 through Send would not alleviate the congestion situation because the bottleneck is at the Old Woking roundabout – there is simply no road capacity leading to the A247 from Woking to allow traffic to flow – there are already long queues and delays during peak times;

- the need for additional industrial development has not been demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object because:

- the site was not included in the regulation 18 draft and the site has not been consulted on previously;

- development for housing is inappropriate on this land which has Green Belt status. This land is currently used daily by myself and others for walking in a natural green environment and which would be spoilt by any development. The subsoil of this land contains documented unsafe landfill waste which is currently vented and is not suited to the proposed development;

- access to the site is poor and limited due to the width of Send Hill road, single track from the proposed site entrance to its junction with Potters Lane and narrow throughout its length, with no pavement for pedestrians for most of its length;

- the number of travellers pitches (2) is out of proportion to the number of houses proposed (40);

- Send Cemetery, the peaceful and well maintained lawn cemetery is on Send Hill, close to the proposed site access. The cemetery has over a thousand people laid to rest here and this proposed development would have a detrimental effect to the quiet, reflective and respectful expectations of cemetery users;

- The Villages Health Centre and Send First School are already at capacity level and the village infrastructure is not able to sustain this additional proposed development;

- Send Hill is a quiet and narrow road. Development for housing is inappropriate due to its permanent Green Belt status and high quality Green Belt amenity within an area of beautiful countryside which would be spoilt by any development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/695  Respondent: 15154593 / Linda Davis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Send being removed from the Green Belt. The land proposed for removal from the Green Belt provides a buffer between Guildford and Woking. Without this buffer the village of Send will lose its village identity and merge with the conurbations of Guildford and Woking. GBC refer to the Green Belt as one of the borough’s biggest assets so this proposal is not designed to protect and enhance this area at all. Removal of Send and neighbouring villages from the Green belt opens up possibilities for further developments off the A3 which would be detrimental to and destroy this beautiful countryside. Guildford would lose its identity and become a sprawling area extending all the way northwards to the M25 junction.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/696  Respondent: 15154593 / Linda Davis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Answer (if comment is on questions 1-7 of the questionnaire): ()
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Process

I object because Guildford Borough Council has not followed the correct process in including the above proposals in the Draft Plan. These are significant changes requiring consultation under Regulation 18, not the Regulation 19 process.

Evidence

I object because:

- Guildford Borough Council’s Transport Assessment was not available to councillors for the vote taken on 24 May on the Draft Plan. Insufficient attention has been given to Infrastructure overload;

- Guildford Borough Council have not demonstrated the need to build on Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/222  Respondent: 15154625 / Jacky Sutton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of evidence for the alleged housing need numbers...

I object to the disregard for pollution and road user safety with the obvious huge and imminent increase in traffic...

This is my email, to object to the 2016 draft local plan.

I look forward to you early response.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/693  Respondent: 15154625 / Jacky Sutton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
<table>
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<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
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<tr>
<td>I object to all erosion of the green Belt...</td>
<td>I object to any 'in-setting' of any villages from the Green Belt...</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
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**Comment ID:** PSLPP16/694  **Respondent:** 15154625 / Jacky Sutton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to the disproportionate amount of development in one area of the borough...

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** SQLP16/253  **Respondent:** 15154625 / Jacky Sutton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to the limited consultation period...

I object to the last minute inclusion of new sites with less than two weeks notice...

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I wish to object to Horsley being removed from the green belt. I also wish to object to the development of 2000 houses at Wisley airfield. It would mean there would be an extra 25000 cars on our already congested roads. It would mean there would be problems for doctors appointments and roads flooding. We do not want to see our countryside destroyed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s draft Local Plan Proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Far, which will:

- Destroy views from the Hog’s Back ridge, a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016). And these are my reasons:

1. I object to the number of houses needed. After the EU referendum I do not believe the proposed housing numbers are still valid. I would like to see a revision to these numbers for the Guildford Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016). And these are my reasons:

1. I object to the number of houses needed. After the EU referendum I do not believe the proposed housing numbers are still valid. I would like to see a revision to these numbers for the Guildford Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to Wisley airfield being considered a brown field site. It is 95% green farm land, with a single strip of tarmac. Converting this beautiful area into a massive housing estate will result in a loss of natural habit for many British animals including wild deer.

1. I object to the size and scale of Wisley airfield development. It will create a massive disproportionate pressure on existing country and trunk roads. The Transport Plan does not properly satisfy the existing gridlock in Guildford and surrounding areas, let alone counter the proposed increase in traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/327  Respondent: 15154849 / Julia Laing  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the proposed development at Garlic's Arch. This is ancient woodland and farmland. There is no proportion to the scale development compared to the existing number of homes in Send Marsh, Burnt Common, and Ripley.

1. I also object to the proposed development at Garlic's Arch because it will create increased traffic issues, pressure on local doctors, and schooling. There is no local secondary school without rush hour bus or train journeys.

1. Last year I wrote to Guildford council for a kerb to be installed outside my house. The response that this is normal for villages in the countryside. I object to the basis on which the proposed plan is diverting from existing principles and proposing 400 homes within 2 minutes walk from my house!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/328  Respondent: 15154849 / Julia Laing  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the building of new A3 slip roads on the Burnt Common junction. These ramps will not only provide access for an unnecessary new site, but will create alternative routes for congested M25 traffic. The proposed traffic plan includes a mere £1.5m to improve the traffic lights in Send, the village is already at standstill during rush hour due to the Old woking mini-roundabout.

1. I also object to the building of new A3 slip roads on the Burnt Common junction as this will increase traffic and damage air quality and congestion around the burnt common roundabout. The roundabout often is congested at peak times. It can take over 20 minutes to get to Clandon station from Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/701  Respondent: 15154849 / Julia Laing  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the irreversible damage building new homes on woodland and farmland will create. A combination of brownfield sites (burnt common) and small infill sites (Anderton’s Farm) are available but have not been considered by the plan.

1. I object to removing villages around Guildford (such as Ripley, Send and Clandon) from the green belt. Villages will be permanently damaged by uncontrolled development. I do not want these villages to become an extension of Greater London via spreading urbanisation. Villages are the culture and heritage of our country.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/703  Respondent: 15154849 / Julia Laing  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the borough wide strategy. We should not be increasing our dependency of cars to move around by building greenbelt housing, and therefore we should be building housing near existing railway stations, or other green transport such as bikes.

1. I object to the building of homes without due thought for school journeys. These represent a large proportion of traffic during rush hours, and the dependency of our children on parents to ferry them around. We should encourage housing to be built near schools or new schools to be built so that children can travel short distances by green transport.

I wish these objections to be fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the Guildford Borough Proposed Submission Local Plan (June 2016). And these are my reasons:

1. I object to the number of houses needed. After the EU referendum I do not believe the proposed housing numbers are still valid. I would like to see a revision to these numbers for the Guildford Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/333  Respondent: 15154977 / Janine Arthur  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Wisley airfield being considered a brown field site. It is 95% green farm land, with a single strip of tarmac. Converting this beautiful area into a massive housing estate will result in a loss of natural habit for many British animals including wild deer.

2. I object to the size and scale of Wisley airfield development. It will create a massive disproportionate pressure on existing country and trunk roads. The Transport Plan does not properly satisfy the existing gridlock in Guildford and surrounding areas, let alone counter the proposed increase in traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/335  Respondent: 15154977 / Janine Arthur  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the proposed development at Garlic’s Arch. This is ancient woodland and farmland. There is no proportion to the scale development compared to the existing number of homes in Send Marsh, Burnt Common, and Ripley.

2. I also object to the proposed development at Garlic’s Arch because it will create increased traffic issues, pressure on local doctors, and schooling. There is no local secondary school without rush hour bus or train journeys.

3. My partner wrote to Guildford council for a kerb to be installed outside my house. The response that this is normal for villages in the countryside. I object to the basis on which the proposed plan is diverting from existing principles and proposing 400 homes within 2 minutes walk from my house!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the building of new A3 slip roads on the Burnt Common junction. These ramps will not only provide access for an unnecessary new site, but will create alternative routes for congested M25 traffic. The proposed traffic plan includes a mere £1.5m to improve the traffic lights in Send, the village is already at standstill during rush hour due to the Old woking mini-roundabout.

2. I also object to the building of new A3 slip roads on the Burnt Common junction as this will increase traffic and damage air quality and congestion around the burnt common roundabout. The roundabout often is congested at peak times. It can take over 20 minutes to get to Clandon station from Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the irreversible damage building new homes on woodland and farmland will create. A combination of brown field sites (burnt common) and small infill sites (Anderton's Farm) are available but have not been considered by the plan.

2. I object to removing villages around Guildford (such as Ripley, Send and Clandon) from the green belt. Villages will be permanently damaged by uncontrolled development. I do not want these villages to become an extension of Greater London via spreading urbanisation. Villages are the culture and heritage of our country.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/715  Respondent: 15154977 / Janine Arthur  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the borough wide strategy. We should not be increasing our dependency of cars to move around by building greenbelt housing, and therefore we should be building housing near existing railway stations, or other green transport such as bikes.

I wish these objections to be fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4044  Respondent: 15154977 / Janine Arthur  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The site is allocated for approximately 400 homes (C3), including some self-build and custom house building plots, and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8)6 Travelling Showpeople plots (sui generis).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp171/2148  Respondent: 15154977 / Janine Arthur  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H3: Rural exception homes

(1) Small affordable housing developments, including pitches for travellers, will be permitted to meet identified local affordable housing needs provided that:

(a) the site adjoins or is closely related to, and in safe and easy reasonable walking distance of a defined or a non-defined rural settlement, and

(b) the number, size and tenure of homes would be appropriate to meet, or to contribute to meeting, the identified local affordable housing needs of the local community

Policy A43a: Land for new north facing slip roads to/from A3 at Send Marsh/Burnt Common

>> I agree with the removal of industrial usage (A43) on greenbelt as per National Planning Policy, but object to the inclusion of Travelling Showpeople plots.

I continue to object to the inappropriate use of ancient GreenBelt land for 400 new houses (A43). This is not sufficient justification (H3) or exceptional circumstances. This is reckless destruction of green belt.

The argument in Policy H3 that it is ok to use green belt land for affordable housing if it is reasonable asking distance to a rural settlement is also not valid. Send is a good 60min walk, and Ripley 45min. This is unreasonable.

Furthermore the local Train station at Clandon is 60min walk. Furthermore the number and size of have no bearing on the needs of the local community! We have no need in Send, Ripley or Clandon for 400 new homes.

I continue to object to the need for a new slip road, especially since it has increased in size to 4.5ha and has no stated purpose or value. It will only lead to further congestion in and around our villages which are gridlocked daily.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/401  Respondent: 15154977 / Janine Arthur  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object very strongly to the original Guildford Borough Proposed Submission Local Plan and the Updated Local Plan.

Cllr Paul Spooner, Leader of the Council, says: "We reviewed the comments from last year's consultation and made a number of significant changes to the plan and proposed sites, as well as updating the supporting evidence and policies. We remain committed to fundamental principles, such as our ‘brownfield first’ policy of proposing sites with past development, and some of the changes increase the number of homes in the town centre with reduced or removed housing sites in rural areas and greenbelt."

The above statement from Cllr Spooner is not reflected in the changes to the Updated Local Plan! Quite the contrary... the continued use of green belt land without sufficient exceptional reason is reckless and an abuse of our country's heritage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
8.) The figure of 693 houses per annum in the Borough being too high. (Appendix D)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2678  Respondent: 15155201 / Ann Lay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary
school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.
- I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.
- Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will mean either major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.
- Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the Guildford Local Plan for the following reasons:

5.) The inclusion of land at Garlick's Arch, Send Marsh/ Burnt Common and Ripley (Policy A43)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/722  Respondent: 15155201 / Ann Lay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7.) The damage caused to the historic environment as a result of the scale of the proposed development. (Policy D3)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/724  Respondent: 15155201 / Ann Lay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

11.) The employment strategy and the impact at Garlick's Arch.(A43),(Policies E2 & E5).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/719  Respondent: 15155201 / Ann Lay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
3.) Due to the congestion that development will cause to the local village roads and the lack of road infrastructure. (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/725  Respondent: 15155201 / Ann Lay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

12.) The lack of proper infrastructure planning for sites (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/727  Respondent: 15155201 / Ann Lay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

14.) Parking issues in local villages caused by a larger population.

15.) Local healthcare facilities becoming overwhelmed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/726  Respondent: 15155201 / Ann Lay  Agent:
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<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</th>
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<td>13.) Due to the congestion that development will cause to the trunk roads, A3/M25 ( PolicyI2 )</td>
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<td>2.) There is no protection of the Green Belt ( Policy P2 )</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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<td>4.) Development in areas which are at risk of flooding . ( Policy P4 )</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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| Comment ID: PSLPP16/717  Respondent: 15155201 / Ann Lay  Agent: |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.) The Local Plan as shown in the development proposed is not sustainable. ( Policy S1 )

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/721  Respondent: 15155201 / Ann Lay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6.) The Borough Wide Strategy ( Policy S2 )

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/723  Respondent: 15155201 / Ann Lay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Guildford Local Plan for the following reasons :

...

10.) The poor air quality pollution concerns ( Policy I3 )

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
### Comment ID: PSLPS16/342  Respondent: 15155393 / Heidi Powell  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**Site A25 / Gosden Hill**

1. I object to this proposal. I am again concerned about the scale of this development and the pressure it would put on local services (education & health). I also question the impact this number of additional people will place on A3 congestion (North & Southbound).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: PSLPS16/341  Respondent: 15155393 / Heidi Powell  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**I’d like my comments below to be taken into consideration for the GBC local plan:**

**Site A35 / Wisley Airfield**

1. I object to this proposal. I objected to this site in 2014 and my views are unchanged. This is a significant development which is not appropriate for the area. It is a greenbelt site and should be kept as such. I find the plan to build 2000 houses is unacceptable and completely at odds with surrounding land use.
2. In addition such a huge volume of housing will add to the already significant access issues to the M25 / J10 and A3. It would also create unacceptable traffic congestion / “rat runs” on the surrounding minor roads.
3. I am very concerned about how local services from education to healthcare could cope with such a large additional population in the area. I question whether this has been properly taken into account and incorporated into the GBC plan.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/343  
**Respondent:** 15155393 / Heidi Powell  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**Site A43 / Garlick’s Arch**

1. I object to this proposal. In isolation I would welcome the provision of a 4 way access to the A3 at Burnt Common as part of this development. However I feel very uncomfortable about the plan for this development alongside sites A35 & A25. This would create a band of housing development totalling 4400 properties in a ribbon running from M25 / J10 to Guildford on land that is greenbelt.

2. I am particularly worried about the traffic management around the Burnt Common area. This is already a busy junction with the Portsmouth Road and with potentially additional traffic from Woking, Clandon as well as those travelling north & south on the A3. I fear this would become a major bottleneck.

Please will you take my comments into consideration.

---

**Comment ID:** PSLPA16/233  
**Respondent:** 15155425 / Graham Brown  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

With reference to the above plan I strongly object for the following reasons:

- I object to all erosion of the green belt
- I object any "inserting" and removal of any villages from the green belt
- I object to the disproportionate amount of development in one area of the borough
- I object to the limited consultation period
- I object to the last minute inclusion of new sites with less than 2 weeks notice
• I object to the lack of evidence of any alleged housing number needs
• I object to the lack of immediate provision for new schools
• I object to the lack of any immediate provision for doctors surgery

Cc'd Sir Paul Beresford as our MP requesting that he consider and invoke the conservative election mandate to "SAVE THE GREEN BELT"

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPA16/238   Respondent:  15155617 / David Vallath-Patel   Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPS16/346   Respondent:  15155617 / David Vallath-Patel   Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/347  Respondent: 15155617 / David Vallath-Patel  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I object to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/739</th>
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1. I object to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/740  Respondent: 15155617 / David Vallath-Patel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/741  Respondent: 15155617 / David Vallath-Patel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **I object to the loss of rural employment (Policy E5)**

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/743  **Respondent:** 15155617 / David Vallath-Patel  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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1. **I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)**

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/744  **Respondent:** 15155617 / David Vallath-Patel  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **I object to the lack of proper infrastructure planning for sites (Policy I1)**

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)**

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
1. **I object to poor air quality concerns (Policy P3)**

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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1. **I object to not protecting the Green Belt (Policy P2)**

I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.
Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/738  Respondent: 15155617 / David Vallath-Patel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/735  Respondent: 15155617 / David Vallath-Patel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. **I object to the Local Plan as the development proposed will not be sustainable (Policy S1)**

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over development, particularly for the villages between Guildford and the M25, including Ripley, Send and Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35) and Garlick’s Arch (A43) are in unsustainable locations. They do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. **I object to the Borough Wide Strategy (Policy S2)**

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of
the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the
borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a
disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of
these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/348  Respondent: 15156033 / Fred Smith  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Support for Wisley Airfield

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/243  Respondent: 15156225 / Valerie Houghton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Plans A25, A42, A43, A43a, A44

I object to all the above plans as they are an unconstitutional attack on the local Green Belt & based on unsubstantiated
housing needs

I also object on the grounds that they are a disproportionate development in our area of the borough.

They do not take into consideration the lack of schools & medical facilities but above all they will have a devastating effect
on the A247. Plans already agreed – ie the Send Marina, & the additional houses on the Vision Engineering plot will be
more than enough to bring this road to rush hour standstill & the Tannery Lane crossroads, already difficult for large
commercial vehicles will become an even more hazardous accident spot. Plan A42, the Clockbarn Nursery development will be especially detrimental at that spot.

The short section of the A247 between the Burnt Common roundabout & the new north & south A3 slip roads will have to absorb all this new local traffic but it will also attract those who currently go through Ripley.

A traffic survey of current levels would surely confirm that there are certain times of the day when we can take several minutes to gain access to the road.

**I most strongly object** to the inevitable increase in air pollution & noise, it is sad to think that we would have to endure even higher levels of both when in our gardens, any further increase will be a threat to health & too much to bear.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** SQLP16/257  **Respondent:** 15156609 / stewart Gibbons  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I would like to object to planned building of 700 homes per year, the area of Send does not have sufficient infrastructure to support this type of expansion. There are insufficient schools, road and transport system. Will destroy the village and its uniqueness, turn the whole are into a massive Conurbation.

The process which this has been proposed contravenes not only planning commitment and guidance as laid down by the government for green belt, but also has ignored due process.

I object to further development for the following reasons. With advent of the UK exit from the EU, the prediction for the requirement for housing and development of commercial units will need to be revised downwards. As the 3 million EU citizens currently in the UK, will be affected by this current event, and their ability to stay in this country will also be affected. So your estimates for further development of housing are wildly exaggerated and need to be revised downwards.

In addition to the potential down grade in the economy due to Brexit, your estimation for commercial and housing development is wildly exaggerated and unnecessary. Given you have allowed development of send marina; I really don’t understand how you can commit to further commercial developments. So therefore this development is folly this area does not need.

In particular, I want to object to all the following points:

I object to Garlicks Arch development of green belt land which contravenes government guide lines and that due process was not followed in the introduction of this development into this plan, and did not follow this process. Its inclusion in this plan was included at the last stage and did not follow process. So for that reason should be excluded.

I object to the council changing the enclosure of green belt land round the Ripley and Send villages, changing of village boundaries to allow for future development.
I object to the wholesale destruction of green belt land in this area (including development of 2000 homes at Gosden hill farm, Merrow, and also Send and Ripley), which contravenes directly the government stated commitment to preservation to green belt land.

I object to the creation of new north and South Bounds slips ways from the A3 to the A247 clandon Road (policy A243) at Burnt common, as in light of the wholly unnecessary due to planned expansion which unlikely be needed within the 10 years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: SQLP16/261  Respondent: 15156609 / stewart Gibbons  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/8305  Respondent: 15156673 / Emma France  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A 43. 30 ha Land at Garlick's Arch, Burnt Common, designated for 400 houses and 7,000 sq m of industrial and warehousing. There is no need for any more houses on top of the 13,860 already proposed for the borough. This site is NEW and was not included in the Regulation 18 draft which has NOT been consulted upon previously. It is Green Belt permanently protected by the NPPF which prevents the merging of settlements. There are no exceptional circumstances. The site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The proposed industrial development of 7,000 sq m is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield. A new 4-way interchange onto the A3 at Burnt Common to serve this development would be disastrous for Send. Send Road (A247) would be gridlocked all day. Send would be the through route to Woking for traffic leaving the M25 and A3, the proposed 2,000 houses at Wisley and the 2,000 houses at Burpham. Send cannot take it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8306  Respondent: 15156673 / Emma France  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A44. 1.9 ha land west of Winds Ridge and Send Hill designated for 40 homes and 2 Travellers Pitches. This site is new and was not included in the regulation 18 draft and have not been consulted upon previously. Development for housing is inappropriate due to its permanent Green Belt status and high quality Green Belt amenity within an area of beautiful countryside which would be spoilt by any development. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 travellers pitches is inappropriate due to the narrow width track country had providing insufficient access to the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18663  Respondent: 15156673 / Emma France  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Policy P2 - Send should not be removed from the Greenbelt. Send provides a buffer between Woking and Guildford. The particularly vulnerable areas of land being taken out of the Green Belt include: 1 - the land behind the school including playing fields and woodland. 2 - the land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering. 3 - Land to the left of Cartbridge going up to the old depot on the Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/262  Respondent: 15156673 / Emma France  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I object. I think that important information has been excluded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/267  Respondent: 15156673 / Emma France  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

Guildford Borough Council have failed to provide sound evidence in terms of the Employment Land Needs Assessment 2015 (ELNA) which shows an 80% reduction in employment space from the previous ELNA carried out by Guildford Borough Council in 2013. This means that industrial space at Burnt Common is no longer needed. Housing numbers from the Strategic Housing Market Assessment 2015 (SHMA) are highly questionable. The number of foreign students has been wrongly used to inflate the need. The required 13,860 houses in the local plan is exaggerated. If the population is to grow by some 20,000 in the plan we actually need 8,000 homes (based on an average of 2.5 persons per home). The Green Belt does not need to be built over. 50% of new homes needed could be built on brownfield sites. GBC's Transport Assessment
was not even available to councillors for the vote taken on 24 May, being published on 6 June. Infrastructure overload has received scant attention.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/263  Respondent: 15156673 / Emma France  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I object

I don't believe that it is legal to build in all the areas planned.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/264  Respondent: 15156673 / Emma France  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I object.

I don't believe that all the areas planned for building in Ripley & Send are suitable and not enough consideration has been given to the impact on access, transport, weight of traffic, crime and schools.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/265  Respondent: 15156673 / Emma France  Agent:
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<td>I object</td>
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<tr>
<td>I don't believe that the authority has done enough in consulting with impacted residents in the borough.</td>
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<td>I object to the plans for additional housing in Ripley &amp; Send. The areas chosen are not all suitable for building due to historic site usage and due to restricted access which will lead to additional traffic in an already busy areas. The impact on existing residents is unacceptable.</td>
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I object to this.

GBC have not followed the correct process. Since 2014 GBC has changed every major site in Send proposed for development and now just added a massive new road junction. The 2014 proposal for 430 houses went down in April 2016 and has just gone up again to 485. These significant changes require another full consultation under Regulation 18, not the short cut of Regulation 19 which GBC are trying to get away with. This invalidates the whole process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/748  **Respondent:** 15156961 / Polly Nicholson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I appreciate that you and your colleagues have a terribly difficult job accommodating everybody's needs but I am deeply saddened by the amount of building that has gone on during my lifetime in the Guildford area. As a society we tend to all be in agreement at our outrage in the destruction of the world's rainforests but seem to be ignoring the destruction of our own countryside. Please, please consider reducing the amount of building before our homeland is destroyed.

Sorry to spoil your Monday morning. I'm sure you're a lovely person but feel the need to speak out about something I feel so passionately about.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/352  **Respondent:** 15157057 / Nigel West  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A21

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please register my support for allotments in Guildford, and in particular my support of policy A21 in your local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/751</th>
<th>Respondent: 15157089 / Louise Duncan</th>
<th>Agent:</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
I also object on the grounds that they are a disproportionate development in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/753  Respondent: 15157089 / Louise Duncan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I most strongly object to the inevitable increase in air pollution & noise. Higher levels of both will be a serious threat to health & well above acceptable levels.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/128  Respondent: 15157377 / David Harrison  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We have the following comments (objections) to the revised GBC Local Plan.

1. We note that East Horsley has not been restored to the Green Belt area. This in our view is a retrograde step bearing in mind national and local undertakings in the past to preserve the Green Belt. We also find it staggering that over 50% of proposed new housing would be in land that is presently Green Belt.

1. The number of new homes proposed in the revised plan seems excessive in the light of current informed opinion on population increase.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1337  Respondent: 15157377 / David Harrison  Agent:
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<th>Respondent: 15157409 / Melanie Sykes</th>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<td>1. We strongly object to the ongoing proposal for 2000+ homes on the Wisley former airfield site. We believe that this will create an unacceptable strain on local resources such as road and rail transport, schooling and medical services.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<td>I do not however object to Bell and Covill Garage plans as the main road offers an infrastructure to support an additional 40 homes or 40 - 50 additional cars on our local roads.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<td>I would like my opposition to the proposed plans to be noted for the following sites:</td>
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<td>Waterloo Farm</td>
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<td></td>
<td>Manor Farm</td>
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</table>
The Horsley Main site
Ockham Road North
East Lane
Thatcher's Hotel

I strongly disagree with encroaching on green belt land by extending the borders of our village.

The green belt is a policy for controlling urban growth and to assist in safeguarding the countryside from encroachment. (National Planning Policy Framework (NPPF) March 2012).

Should you ignore this, I along with other residents would consider legal action.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/360  Respondent: 15157473 / Margaret Dodson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the council's proposals to build 1800 houses, an industrial park and a highway on the slopes of the hog's back at Blackwell farm. The proposals will:

1. destroy the views from the hog's back ridge - a nationally designated area of outstanding beauty
1. Remove 72 hectares of scenic farmland and additional woodland from the green belt
1. Increase traffic and congestion
1. It amounts to over development and it is not needed

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/361  Respondent: 15157505 / Linda Leunissen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43

Garlick’s Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for it’s removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance

The site is not appropriate because:

• The site has Ancient woodland and is a wildlife habitat. Any ancient woodland should be protected for future generations.
• There is no sustainable transport infrastructure.
• The site is liable to frequent flooding
• There are no plans to improve local schools, medical or utilities to cope.

I wish these objections to be fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/770  Respondent: 15157505 / Linda Leunissen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

There is too much traffic in our villages already (ever tried driving from Pyrford into Ripley and onto Portsmouth road without scratching up your car?) and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that.

The rural roads in this area are narrow, in poor condition and have no footpaths.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/769  Respondent: 15157505 / Linda Leunissen  Agent:
1. I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy. The green belt is what makes these villages attractive to live in in the first place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/768  Respondent: 15157505 / Linda Leunissen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)

The number of new houses proposed is not sustainable – it will damage local communities by over-development, especially Ripley, Send and Clandon. These villages are popular due to their old world, small village charm, which will be completely undone by your proposed development.

Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. Local roads will not be able to deal with these number of cars. The development should be in urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/246  Respondent: 15157537 / Elizabeth Ravenhill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The lack of any evidence for the alleged housing need numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/773  Respondent: 15157537 / Elizabeth Ravenhill  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Then lack of infrastructure provision

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/774  Respondent: 15157537 / Elizabeth Ravenhill  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The lack of consideration for wildlife that live in the woods and fields in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/771  Respondent: 15157537 / Elizabeth Ravenhill  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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<td>All erosion of the green belt</td>
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<td>Any insetting (removal) of any villages from the greenbelt</td>
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<td>Then disproportionate amount of development in one area of the Borough</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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<td>Then disproportionate amount of development in one area of the Borough</td>
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<td>The limited consultation period</td>
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<td>The last minute inclusion of new sites with less than one month's notice</td>
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<td>Attached documents:</td>
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</table>
I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/247  Respondent: 15157601 / Barbara Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/363  Respondent: 15157601 / Barbara Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for it’s removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance.
The Plan states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch.

The site is not appropriate because:

- There is no sustainable transport infrastructure.
- The site is liable to frequent flooding
- The site has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.
- There are no plans to improve local schools, medical or utilities to cope.

**1. I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)**

There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/364  **Respondent:** 15157601 / Barbara Walker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**Comment ID:** PSLPP16/780  **Respondent:** 15157601 / Barbara Walker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Page 2623 of 2855
1. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

There is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that.

The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses means dangerous and unsustainable traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>PSLPP16/782</th>
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1. I object to the lack of proper infrastructure planning for sites (Policy I1)

The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.
There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/783  Respondent: 15157601 / Barbara Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/781  Respondent: 15157601 / Barbara Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to poor air quality concerns (Policy I3)

The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/776  Respondent: 15157601 / Barbara Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick’s Arch.

The development should be in urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/779  Respondent: 15157601 / Barbara Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

1. I object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/365  Respondent: 15157665 / James Laing  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
1. I object to Wisley airfield being considered a brown field site. It is 95% green farm land, with a single strip of tarmac. Converting this beautiful area into a massive housing estate will result in a loss of natural habit for many British animals including wild deer.

1. I object to the size and scale of Wisley airfield development. It will create a massive disproportionate pressure on existing country and trunk roads. The Transport Plan does not properly satisfy the existing gridlock in Guildford and surrounding areas, let alone counter the proposed increase in traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/366  Respondent: 15157665 / James Laing  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the proposed development at Garlic's Arch. This is ancient woodland and farmland. There is no proportion to the scale development compared to the existing number of homes in Send Marsh, Burnt Common, and Ripley.

1. I also object to the proposed development at Garlic's Arch because it will create increased traffic issues, pressure on local doctors, and schooling. There is no local secondary school without rush hour bus or train journeys.

1. Last year I wrote to Guildford council for a kerb to be installed outside my house. The response that this is normal for villages in the countryside. I object to the basis on which the proposed plan is diverting from existing principles and proposing 400 homes within 2 minutes walk from my house!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/367  Respondent: 15157665 / James Laing  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the building of new A3 slip roads on the Burnt Common junction. These ramps will not only provide access for an unnecessary new site, but will create alternative routes for congested M25 traffic. The proposed traffic plan includes a mere £1.5m to improve the traffic lights in Send, the village is already at standstill during rush hour due to the Old woking mini-roundabout.

1. I also object to the building of new A3 slip roads on the Burnt Common junction as this will increase traffic and damage air quality and congestion around the burnt common roundabout. The roundabout often is congested at peak times. It can take over 20 minutes to get to Clandon station from Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/787  Respondent: 15157665 / James Laing  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the building of homes without due thought for school journeys. These represent a large proportion of traffic during rush hours, and the dependency of our children on parents to ferry them around. We should encourage housing to be built near schools or new schools to be built so that children can travel short distances by green transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/785  Respondent: 15157665 / James Laing  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to removing villages around Guildford (such as Ripley, Send and Clandon) from the green belt. Villages will be permanently damaged by uncontrolled development. I do not want these villages to become an extension of Greater London via spreading urbanisation. Villages are the culture and heritage of our country.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016). And these are my reasons:

1. I object to the number of houses needed. After the EU referendum I do not believe the proposed housing numbers are still valid. I would like to see a revision to these numbers for the Guildford Borough.

1. I object to the irreversible damage building new homes on woodland and farmland will create. A combination of brown field sites (burnt common) and small infill sites (Anderton's Farm) are available but have not been considered by the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. I object to the borough wide strategy. We should not be increasing our dependency of cars to move around by building greenbelt housing, and therefore we should be building housing near existing railway stations, or other green transport such as bikes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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</table>
Dear Guildford Borough Council, I think Wisley Airfield is the right location for a new community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/250  Respondent: 15157761 / Alan Sandell  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

General

I am only commenting on those aspects of the plan that affect Send.

I understand the requirement to build more housing but I am not convinced of the need to provide more industrial and business space in our area and I object in particular to the additional industrial and business space at places such as Garlick’s Arch. What’s wrong with the existing industrial areas?

I object to the fact that the plans don’t seem to really tackle the infrastructure problems caused, such as local road capacity, local public transport, school places, doctors, dentists, hospital, local shopping and other amenities. The plans make reference to a number of projects but there seems to be no attempt to tie the various relevant parts of the plan together.

I object to the fact that significant changes have been made to the plan at a late stage without the required consultation period.

You state “Developers of allocated sites are encouraged to progress housing proposals as soon as possible”. I object to that since it is not a good thing if solutions to the associated infrastructure problems are not progressed at the same time.

I also object to the fact that Send has been inset from the Green Belt. That only encourages encroachment on the Green Belt, as witnessed by a number of the schemes. In addition Send forms part of the Green buffer area between Woking and Guildford, and this must be preserved.

I object to having nearly half the growth in housing for Guildford Borough in Send and the immediate surrounding area. Surely if such a large quantity is required then it should be spread around the Borough more evenly.

Site 43A – Slip roads at junction of A247 and A3 at Burnt Common

This seems to be a good thing – it will undoubtedly ease the traffic in Ripley and I don’t understand why it was not built when the Ripley by-pass was built. I know the reason given, but my view has always been that these additional slip roads were necessary. I personally doubt that, on its own, it will significantly change the amount of traffic in the surrounding area, but this needs to be carefully monitored.

Site 42A – Clockbarn Nursery

I object to this because it is on a narrow road, Tannery Lane, and the junction of Tannery Lane with the A247 in the middle of Send Village is already an awkward and dangerous junction. There needs to be a serious review of the traffic situation.
I also object to this development since no consideration seems to have been given to the fact that 45 extra houses will impact the Doctor and Schools in the village.

I also object on the grounds that this is an extension of the village into Green Belt land along a road that is mainly rural.

**Site 44A – Land west of Send Hill**

I object to the underhand and cynical way that this proposal was slipped into this version of the Local Plan at the ‘last minute’ without any prior consultation period.

I object to this proposal because it is on a narrow road, Send Hill, that already takes quite a lot of traffic. In particular Send Hill down to Potters Lane is already a narrow and dangerous stretch of road with a dangerous junction where it meets Potter Lane.

I also object to this development since no consideration seems to have been given to the fact 40 extra houses and 2 Traveller Pitches will impact the Doctor and Schools in the village. There will also be an impact on visitors to the nearby cemetery.

I also object on the grounds that this is an extension of the village onto Green Belt land, between two well used footpaths, and is on an area often used for recreational activities and dog exercising.

I worry about how the Traveller Pitches will be incorporated onto such a small site – it needs to be done well to not spoil the environment for others. I would also have thought that two sites is actually too small a number – don’t travellers tend to travel in groups? Wouldn’t it therefore be better to incorporate a bigger group on to a larger site. I feel that there is a danger that these two pitches could become overcrowded and spoil things for everyone. I object to the fact that proper consideration of this appears not to have happened.

I also remember this site being used as landfill only about 30 years ago and it still has ventilation pipes in it. Is the site really suitable for a housing development? Has that been investigated properly?

This site is shown as smaller than the total potentially available area which leads me to suppose that once some houses have been built it could easily be extended with even more houses, thus further eroding the Green Belt area. This is another cynical attempt to hide a potential extra encroachment on Green Belt land at a later date.

I trust that you will consider the above points and modify the plan accordingly.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/251  **Respondent:** 15158561 / Graham Lloyd  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
I strongly object to the proposed housing developments planned for West Horsley.

The village of West Horsley already struggles with peak time traffic, local school places, village parking, station parking, doctors availability etc etc. The planned addition of 1,111 homes in our small village will increase the population by approximately 4000 people, adding at least 2000 additional cars to our local environment. This will adversely change/ruin the appearance and character of our village forever.

I also believe that ignoring the green belt will be at our peril. We need to protect our green areas or lose our air quality for the whole of the South East of England. There are so many brown field sites that should be considered first before riding rough shod over the green belt policy.

Personally, I moved to Surrey from London due to price pressure. This is something that people have to accept, we can't keep building just to allow our children to live in the area they were raised. This housing won't help matters in that respect. As soon as they are built, they will reflect Surrey house prices, making them unaffordable to young people. The North - South divide is set to widen with this type of housing policy. The Country is in danger of tipping up with the Weight of housing and population in the SE compared to other parts of the country.

The proposed developments are far too large to 'fit in' and would destroy our village way of life. Can these developments be spread more evenly around the county of Surrey, in smaller scale, consequently reducing impact on Surrey citizens?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/254  Respondent: 15159201 / Hayley van Kasteren  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am a resident of the village of Normandy with concerns of the proposed to development in your local plan.

I live in Normandy with my husband & my 2 sons aged 4 & 1. My 4 year old son currently attends the local preschool & will attend Wyke the village school in September. My husband & I both work at Heathrow airport so regularly use the local motorways.

I believe the proposed development of the greenbelt land will have an extremely negative effect on our village. We live on Westwood lane which at peak times of the day is a very busy 'rat run' used by people driving from other areas to the hogs back. People drive at shocking speeds down our lane & the addition of extra houses & a secondary school will only make this worse. I do not think the roads in Normandy are designed for such a volume of traffic.

When I walk my son to preschool I do not feel safe due to the speed people drive & can imagine it will become such that residents cannot walk to school due to the volume of fast moving cars. It will simply be too dangerous for young children.

As well as this there will be building traffic for years to come while this development is taking place. This will become a totally different village to bring up our children in. My husband & I regularly drive to Heathrow airport at peak times & the traffic is absolutely horrendous as soon as we get to the top of Wanborough Hill. How will the hogs back & A3 cope with this extra volume of traffic?
This development will have a negative impact on wildlife due to building on greenbelt land as well as spoiling the look of the beautiful countryside.

There is not enough infrastructure in our village to cope with the extra residents. The primary school is not big enough, nor is the doctors & there are no shops or other facilities here.

As far as I am aware there is no need for an extra secondary school as there are enough spaces at other local schools. Families who move to Normandy do so knowing there is no secondary school in the village & that our children will most likely attend Ash Manor. So the proposed secondary school is not planned to serve existing residents but merely to serve the new estate.

If this development goes ahead it will be devastating for the residents of Normandy & we very much hope there is a better alternative than building in our protected greenbelt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy A46 should be extended to incorporate land to the west of Westwood Lane between the railway line to the south and the A323 Guildford Road to the north. Please see Plan attached.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Location_Plan__Westwood_Lane__2016_07_15 (3).pdf (337 KB)

Comment ID: PSLPP16/798  Respondent: 15159873 / Martin Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Yesterday morning I cycled out from Ripley on my bicycle enjoying the beautiful green countryside that has been preserved for us by previous generations.

In my opinion it is exceptionally sad that the removal of the green belt status has been proposed.

Removal of the green belt and the subsequent urbanisation of our villages and countryside is a one way decision. Once destroyed he countryside is gone forever.

In principal I am not against the development of new homes but it feels like the removal of the green belt and the disproportionate amount of proposed development is being made without any consideration of the infrastructure in our local area.

This week it took me an hour to drive from Ripley into Guildford, it took my wife an hour to drive from Weybridge to Cobham, parents cannot get their children into local schools, it can take 2 weeks to see your GP and the Royal Surrey hospital is at breaking point. Rush hour trains from Guildford and Woking to London are amongst the most overcrowded in the United Kingdom. Is the solution to this really to build the proposed quantity of new homes?

Specifically

1. I OBJECT TO ALL EROSION OF THE GREEN BELT

2. I OBJECT TO ALL "IN SETTING" OF ANY VILLAGES FROM THE GREEN BELT

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17366  Respondent: 15159873 / Martin Smith  Agent: Vail Williams LLP (Jane Terry)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The spatial vision of the draft Local Plan seeks to maintain the extent and function of the Green Belt in order to protect the character of the Borough. However, paragraph 4.3.16 recognises that there are exceptional circumstances to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development. Paragraph 4.3.17 notes that land has been removed from the Green Belt in order to enable development around selected villages. In accordance with the conclusions of the Green Belt and Countryside Study Volume IV Insetting of Villages, Normandy and Flexford have become inset from the Green Belt (paragraph 4.3.13). These changes to the Plan are supported.

Nevertheless, the strategic development proposed at Normandy/Flexford does not go far enough. In relation to Normandy, Volume IV of the Green Belt Study: Insetting concludes that the village be inset within the Green Belt. This conclusion was based on a number of factors including:

- The high and medium density and distribution of residential development located on A323 Guildford Road, Anchor Close and Walden Close;
- The intermittent visual connections between the village and the wider Green Belt with the exception of Normandy Community Centre playing fields; and
- The presence of recognisable and defensible boundaries including the A323 Guildford Road, woodland at Normandy Common, Anchor Copse, hedgerows to the north of playing fields at Normandy Community Centre, and surrounding Glazier’s Lane, Mariner’s Close, Wyke Churchyard and Walden Cottages.

Similarly, the Study concluded that Flexford to the south of the railway line should also be inset based on:

- The difference in open character to the north and south of the railway line, with high density development and enclosure more evident to south of the railway line in comparison to the north;
- The high density residential development located on Christmas Pie Avenue, Orchard Way, Cull’s Road, Flexford Road and Westwood Lane to the south of the railway line; and
- The presence of recognisable and defensible boundaries to the south of the railway line including tree belts to the east of The Paddocks, Crossways and Flexford Road, the hedgerows and newly planted woodland to the south of Flexford Road, and fence lines, hedgerows and tree belts to the west of Westwood Lane. A significant amount of existing development already lies to the west of Westwood Lane and will relate to the proposed strategic development allocation.

These conclusions were based on a very limited perceived extent of the village area and by no means included all existing development which clearly does form part of each wider village as it is on the ground. For instance a significant amount of built form exists to the west of Westwood Lane and at Wyke. The summary conclusions against each of these villages also makes reference to their relationship with the proposed strategic development allocation (Policy A46) which will further emphasise their physical and functional integration.

Consequently it is considered that land to the west of Westwood Lane albeit assessed within a different Land parcel, clearly relates to the SDA and should be included within it and / or the insetting of Normandy and Flexford.

To reinforce this, it is considered that the land in question does not contribute to any of the five purposes of a Green Belt:

- To check the unrestricted sprawl of large built-up areas. The Plan seeks to deliver development for the needs of the Borough for the next 20 years. Accordingly it has the ability to contain further growth to the areas identified within the Plan. There is no need for a subsequent layer of restriction imposed by Green Belt designation;
- To prevent neighbouring towns merging into one another. There is a significant separation between Normandy/ Flexford and development of and significance at Ash to the west and the level of development envisaged to the west of Westwood Lane would not in anyway merge the two areas.
• To assist in safeguarding the countryside from encroachment. As above, there is no necessity for further safeguards in this area;
• To preserve the setting and special character of historic towns. No special character has been identified at Normandy or Flexford which would be impacted by additional development to the west of Westwood Lane; and
• To assist in urban regeneration, by encouraging the recycling of derelict and other urban land. That there is insufficient derelict and other urban land available to meet the needs of the Borough is recognised through the draft Plan through the relaxation of Green Belt boundaries in locations such as Normandy/Flexford.
• The area is generally unconstrained and, being adjacent to the proposed strategic development area, will contribute to the planned comprehensive and integrated development in a sustainable way.

In conclusion it is considered appropriate for land to the west of Westwood Lane to be incorporated within the inset area around the SDA at Normandy / Flexford.

Further changes should be made to the Green Belt designation in the vicinity of Policy A46 with the incorporation of land to the west of Westwood Lane between the railway line to the south and the A323 Guildford Road to the north. The extent of this area is indicated on the attached plan.

In order that sufficient land is made available at the proposed Potential Development Area at Normandy / Flexford to ensure a sustainable and inclusive community and to ensure that sufficient land is made available to deliver objectively assessed housing needs across the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/799  Respondent: 15159873 / Martin Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. 1 OBJECT TO THE DISPROPORTIONATE AMOUNT OF DEVELOPMENT IN ONE AREA OF THE BOROUGH
1. 1 OBJECT TO THE LIMITED CONSULTATION PERIOD
1. 1 OBJECT TO THE LAST MINUTE INCLUSION OF NEW SITES WITH LESS THAN 2 WEEKS NOTICE

Our legacy should not be to destroy the special villages and countryside environment we have all chosen to live in.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17367  Respondent: 15159873 / Martin Smith  Agent: Vail Williams LLP (Jane Terry)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S2 states that the Plan is based on national planning policy with recognition of environmental constraints and the availability and viability of land for development. The preference for growth is in the most sustainable locations making the best use of previously developed land (including in the Green Belt if necessary).

The general principle set out within Policy S2 is supported. The use of areas least impacted by environmental constraints is also supported, as is the use of Green Belt land where necessary to deliver sustainable development to meet the required growth needs of the Borough.

However, the Plan does not go far enough in exploiting the sustainable locations of the Borough. The Green Belt Study is a key part of the evidence base which has influence the identification of potential development areas. We consider much of the Green Belt Study to be unjustified and as such the Plan is not effective.

Much of the housing development identified through the Plan is to be delivered through strategic sites. Whilst it is recognised that a significant amount of development within the Plan period will need to come forward through such sites, these are notoriously difficult to deliver in a timely way and are often subject to delays due to reasons of land assembly and the provision of the up front infrastructure required. As such, and in order to maintain and deliver a robust supply of housing land, a significant number of smaller sites which are unconstrained by environmental, ownership or infrastructure, and which can therefore be brought forward quickly and easily in the early years of the Plan should be allocated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

? The Green Belt and Countryside Study;
? Infrastructure Deliver Plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

For the Plan to comply with the test of soundness it must be:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

We do not consider the Plan will be effective in delivering the required housing growth in line with the needs of the Borough. This is because:

- There is over reliance of a few very large strategic sites;
- Effective joint working has not been demonstrated with neighbouring authorities on cross boundary strategic priorities including the need for Guildford to deliver additional housing where those authorities are more heavily constrained;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1959  Respondent: 15159873 / Martin Smith  Agent: Vail Williams LLP (Jane Terry)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is not clear how the Duty to Cooperate has identified any unmet needs arising from neighbouring constrained authorities such as Waverley Borough Council and as such it cannot be concluded that the Duty to Cooperate has been complied with.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1960  Respondent: 15159873 / Martin Smith  Agent: Vail Williams LLP (Jane Terry)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In order that sufficient land is made available at the proposed Potential Development Area at Normandy / Flexford to ensure a sustainable and inclusive community and to ensure that sufficient land is made available to deliver objectively assessed housing needs across the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SLP16/1961  Respondent: 15159873 / Martin Smith  Agent: Vail Williams LLP (Jane Terry)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

These representations are made in respect 13.5ha / 33.4A of land to the west of Westwood Lane, Flexford (Plan Attached). The Site currently comprises a series of fields currently used for ‘horsiculture’. The land sits between residential properties to the north and the railway line to the south. The site’s character is indistinguishable from land on the opposite side of Westwood Lane to the east. The field parcels are of irregular shapes and sizes and feature mature trees at the boundaries. Consequently, the site is well contained physically and visually on all sides such that there are no long-distance views afforded beyond.

Vehicular access can be gained directly from Westwood Lane into the site whilst there are two footpaths running east-west from Westwood Lane. These links offer an opportunity to connect the proposed Strategic Development Area to the wider footpath network and countryside beyond. Enhancements of this existing footpath network offering recreational opportunities would be possible as part of any development proposals.

The site offers an ideal opportunity for the siting of low density development, specialist housing, retirement housing, or housing for elderly people such as a care home or extra care facility. Such low density development would act as a transitional development between the higher density core of the Strategic Development Area and the countryside beyond. Existing landscape features including the mature boundary trees would be retained to provide the new development with a ‘parkland’ setting. Such development would contribute to the requirements of Policy H1 Homes for All and the housing mix set out in the Strategic Housing Market Assessment.

The site abuts the strategic development site to be allocated to the south of Normandy and north of Flexford (Policy A46). As such it benefits from the provision of infrastructure and improvements to the local highway network already identified within the Infrastructure Delivery Plan including projects LRN17, 18, 19, EG6, WS4, WCT5, PED1 and SED3. Consequently additional development in the vicinity can contribute to and benefit from these infrastructure improvements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Location_Plan__Westwood_Lane__2016_07_15 (4).pdf (337 KB)
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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1. I OBJECT TO THE LACK OF EVIDENCE FOR THE ALLEGED HOUSING NEED NUMBERS

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/804</th>
<th>Respondent: 15159905 / Vicky Smith</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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1. I OBJECT TO THE LACK OF IMMEDIATE PROVISION FOR NEW SCHOOLS

1. I OBJECT TO THE LACK OF ANY IMMEDIATE PROVISION FOR DOCTORS SURGERIES

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/801</th>
<th>Respondent: 15159905 / Vicky Smith</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</table>
In my opinion it is exceptionally sad that the removal of the green belt status has been proposed.

Removal of the green belt and the subsequent urbanisation of our villages and countryside is a one way decision. Once destroyed the countryside is gone forever.

In principal I am not against the development of new homes but it feels like the removal of the green belt and the disproportionate amount of proposed development is being made without any consideration of the infrastructure in our local area.

This week it took my husband an hour to drive from Ripley into Guildford, it took me an hour to drive from Weybridge to Cobham, parents cannot get their children into local schools, it can take 2 weeks to see your GP and the Royal Surrey hospital is at breaking point. Rush hour trains from Guildford and Woking to London are amongst the most overcrowded in the United Kingdom. Is the solution to this really to build the proposed quantity of new homes?

Specifically

1. I OBJECT TO ALL EROSION OF THE GREEN BELT

2. I OBJECT TO ALL "IN SETTING" OF ANY VILLAGES FROM THE GREEN BELT

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I would like to object to the above plan.

I object to:-

1. The number of homes being proposed
2. The enclosure of protected green belt land within the proposed new village boundaries
3. The Garlick’s Arch proposal to build 400 new houses and 7000sq.mt. of light/general industrial/storage distribution space on the green belt
4. The creation of new north and southbound slip roads to and from the A3 to the A247 Clandon road at Burnt common
5. The wholesale destruction of the green belt in this area(including the planned development of 2000 houses at Gosden Hill Farm, Merrow in clear contravention of the governments stated commitment for green belt protection.
6. There being no provision to provide schools in an area already desperately short of this facility
7. No provision for improved road networks which are notoriously bad in the area.
8. No provision for improved and sufficient medical resources in the area.
9. No consideration for and improvement to the infra structure including the provision of sufficient water and other supplies
10. The destruction of villages which have existed for hundreds of years
11. Further development in the South East especially in an area already over populated
12. The council proposing these plans without a clear mandate from the electorate.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I Object to the 2016 Local Draft Plan

I wish to record my strong objections to the Draft local Plan which is out for public consultation currently.

I live in West Horsley and I am aged 13. My family moved to this area because we did not wish to live in an urban location (like Guildford itself) - we like the countryside with its open, green spaces.

We have learned at school about the Green Belt which I think should be protected from erosion by possible future disproportionate development- I don't think that you have even done a full survey to get proper evidence of the local housing need.

Please note that I object, very strongly, to the following:

lack of evidence of the housing need in the borough;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
It is already hard to get a GP appointment, to get your child a place at the school locally, to travel around the area because of so much traffic, so why make things worse within these local villages? The roads are already too dangerous for me to cycle on because there are so many cars, without adding to these by building lots of smaller developments all over the place - why not concentrate on the bigger brownfield sites?

Please ensure that my comments are available for the Independent Inspector.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/809</th>
<th>Respondent: 15160769 / Elliott Stuart</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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I object to West Horsley, and all the other local villages, being removed from the Green Belt - this is being done just so that you can then allow increased development which is not wanted by local people. There are lots of other areas (like the old Wisley Airfield) which could be developed upon and which have good links to the bigger roads which could and should be used first.

Removal of villages from the Green Belt allowing increased development into the future;

The proposed erosion of the Green Belt in any way, shape or form;

The really short time frame for consultation of the Draft Local Plan;

The council ignoring the many suitable brownfield sites within the borough which could be used for future development;

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPA16/269</th>
<th>Respondent: 15161345 / Jane Ditchburn</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford</td>
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I write with great concern in respect of the huge proposed Taylor Wimpey 'housing estate' on the fields between Glaziers Lane & Westwood Lane.

I've lived in the village for just over 20 years and seen many changes which I believe everyone has embraced. However I have grave concerns over many matters that would occur if the 1100 houses, secondary school and shops were built.

- Currently I travel to Guildford on the A31, and I can see from my house that from 7am – 9.30am there are extremely long delays, with at least one accident per week on the A31 or A3. A journey of 15 minutes on a Saturday can take between 45minutes to 1 1/2 hours in the week. With approximately another say 700 vehicles on this road, the journey would be horrendous.

- The Aldershot/Guildford road really does not have the capacity to take anymore traffic as this is also solid with commuters.

- Two real concerns are the 'One Way Railway Bridge' in Westwood Lane, which is extremely dangerous as it is (with the residents of Beech Lane unable to see anything travelling up Westwood Lane to the Hogs Back), and the very small Bridge at Wanborough Station (which has a left hand kink as you cross the bridge), there are numerous near misses with traffic overtaking either side of the bridge, which slow drivers, horses, cyclists or motorbikes are using the road, and large lorries appearing at the brow of the hill.

- The Village would turn into a Building Site for at least 10 years with huge amount of large lorries using Glaziers Lane, as they are unable to go through the bridge at Westwood Lane.

- The area that has been chosen is beautiful, we use the footpath 'The Avenue' regularly for our dog walks. There are much less attractive areas which would be more suitable to site a housing development.

- The majority of the locals moved to Normandy so they could enjoy the rolling countryside, peaceful environment, and a village life. If we wanted to live in a large urbanised area we would have looked at a different location. Sad many people feel they would need to up sticks and move due to a large building company wanting our lovely green belt.

- Why would we need a new school, when Kings College and Ash Manor are under subscribed? Just because Cllr Spooner says that a Secondary School 'TRUMPS' planning! Is this really fair?

- How will our small village roads cope with this? A St Peter's bus travels up Culls Road every morning, does a loop round Christmas Pie and travels back down Glaziers Lane. During the Winter when several neighbours had some building works going on, and some residents leave their vehicles in the road which they are entitled to do. The Bus just drove all over the grass verges, and left huge ruts in them!! We like to keep our properties looking nice and just one bus caused this destruction, for months. The road is not wide enough to cope with a double decker bus, and I can only see more of this happening with extra traffic in the village.

- Another concern is the parking for the station, currently people park in Culls Road, and the Paddocks due to double yellows round at the Station and £2 a day charge. This will only increase, people like to park as near to the Station as possible!

We would like to stay a village, not ASHWYKEFLEXFORD&NORMANDY merged..

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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<th><strong>Reference A26</strong></th>
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| Currently, during rush hour in the morning, there are lengthy tail backs on the A3 heading north, the A31 towards the A3 interchange, the A3 interchange with Egerton Road and the Research Park/Royal Surrey/Sports Park complex. The amount of current traffic issues in this area already results in major delays for motorists. A decision to build the number of new houses proposed at Blackwell Farm, with A3 access via Down Place or Egerton Road, would significantly add to traffic congestion in the whole area, only adding further to delays on the A3, the A31 and access to the Research Park area. During the evening rush hour, traffic on the A3 currently often tails back to Burpham and there is significant congestion on the northern edges of the town with traffic seeking to join the A3.

It is essential that considered and significant new road infrastructure is in place prior to construction of any new housing at Blackwell Farm. Infrastructure needs to be capable of handling what is likely to be over 3-4,000 additional cars, plus delivery vans and lorries, buses, taxis etc. Merely adapting the Down Place and Egerton Road interchanges will not ease current A3 or A31 traffic, nor facilitate the extra traffic from this development.

From the proposals as presented, insufficient consideration has been given to road network improvements around the suggested Blackwell Farm development (whether or not the 'tunnel' ever sees the light of day) - both Surrey County Council and National Government should be involved in creating an infrastructure plan that will reduce congestion in the event these proposals go ahead, not increase it.

<table>
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<tr>
<th><strong>Reference A46</strong></th>
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| The proposal to develop 1100 new homes with no genuine improvements to the road infrastructure needs to be reconsidered. The A323 already carries a high level of traffic during rush hours heading both East and West. Westwood Lane and Glaziers Lane are relatively narrow roads that currently have lengthy traffic queues during rush hours, especially at the A323 junction. The B3000 through Wanborough is a narrow country road with major traffic congestion currently at the junction with the A31 during both rush hours. In the morning on Wanborough Hill and towards the A3 junction, in the evening on Puttenham Hill and on the A31 slip road.

1100 new houses in the Normandy/Flexford area will only add to this congestion, especially if a new school is built with the additional traffic that would entail.

Much more consideration needs to be given to developing a workable road infrastructure that will ease congestion rather than adding to it and this needs to be in place prior to any additional housing development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<tr>
<th><strong>Comment ID:</strong> SQLP16/271  <strong>Respondent:</strong> 15163297 / Barbara Collins  <strong>Agent:</strong></th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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</table>
I have read through the Guildford plans and although you state that in all cases you have taken infrastructure into account I cannot see how justification can be made for:

1) the amount of proposed housing in Walnut Tree Close adding to the already congested and narrow road. I do not believe that all of the proposed new residents will rely solely on public transport (although this would be an ideal scenario), as in general most adults own a car. Walnut Tree Close is already an extremely difficult road to traverse and is highly used due to access for the railway station, the Post Office and Businesses based there. The question is: How do you propose to improve the infrastructure and access to the amenities in Walnut Tree Close with the additional housing?

2) I could not see any mention of additional schools for the proposed new residents. Surely this is an oversight?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object strongly to any 'plan' to build on the green belt. I ask you the question. What makes Guildford a reasonably pleasant place to live? Answer, in my opinion is the green belt. Once that goes there is nothing left, and a total reduction in quality of life with all the associated problems that come with such high density housing, schools, hospitals, pollution etc. In my opinion this is environmental vandalism straight out the top drawer.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/922  Respondent: 15164033 / Michael Blowfield  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

How do you justify this environmental vandalism? High density nasty cheap to build houses at outrageously inflated sale prices on a green belt area with little consideration for the decrepit infrastructure, pot holed roads, schools, hospitals etc and above all the local residents! This sure is going to improve the lot of the people who live round here. Maybe your long term plan is to join up with Aldershot and Farnham and create one ghastly concrete jungle. Oh yes, silly me, its to meet government targets.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/382  Respondent: 15164065 / Andrew Morton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I would like to object strongly to the proposed development at Send and Ripley, particularly the A44 site, and for my comments to be seen by the planning inspector.

It appears a previous proposal was rejected and now Guildford BC have decided to ignore this decision and are now looking to push another proposal through, this time with increased house numbers along with gypsy camps and an industrial development built on greenbelt.

As a resident of Worsfold Close, (off Potters Lane) I know how dangerous it is currently, trying to turn on to Potters Lane particularly during the morning and evening rush hours, there is often ill feeling between motorists and I have had several near misses. Towards the end of Potters Lane, as you get near to the A3, the road is mostly single lane and I have seen and been involved with a number of near misses, building more houses, gypsy camps and industrial units will increase traffic and the chances of accidents and possibly fatalities.

Guildford BC obviously see Send as a backwater, out of site and mind, where they can fulfil their quota’s without upsetting the residents living in the expensive part of the borough.

There is really only one way to get from Send/Ripley to Woking, that's over the river Wey at Old Woking, again in rush hour periods and school start and ends, the traffic can back up from Old Woking all the way back to Send village, again this can only get worse.

I also object strongly to Guildford BC’s unbelievable and disgraceful proposal removing Send Village from the Green Belt. This is why many people have decided to make their home here, nearby there are important areas for wildlife, home to many protected species. I understand there needs to be some development, but this should be spread around the Guildford borough and they may need to upset some of their more valued residents, instead of putting so much pressure on the Send/ Ripley greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/265  Respondent: 15164641 / Carol Lander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing in response to the new Local Plan for Guildford.

I **strongly object** to these extensive plans for development, particularly with regard to the 1,100 houses and seven form entry secondary school proposed for site A46, in Normandy.

My husband and I moved to Normandy just under two and a half years ago, following my retirement. We were delighted to find this area, described by the estate agents as semi-rural, where we could escape the hectic lives we have lead in London and enjoy the countryside, whilst retaining good links to all necessary amenities. We have been even more delighted since moving here to find a strong village community, with a focus of activities centred around the village hall. We enjoy the variety of wildlife that visits our garden and the fact that we can go on local countryside walks.
However, it is not purely for selfish reasons that I object to the local plan. The following are reasons why I think the proposed development in Normandy should not go ahead:

1. The need for a new secondary school has not been proven. I understand that neighbouring schools are currently grossly undersubscribed and that both Ash Manor and King's College are happy to expand, should the future need arise. This would be a far less costly solution.

1. Local roads could not possibly cope with the increased volume of traffic. Both Glaziers Lane and Westwood Lane are in fact 'lanes' and not built for a large volume of traffic. Westwood Lane contains a railway bridge, where the road is only wide enough for one car and the height is restricted (e.g. a double-decker bus would not be able to pass under the bridge). We live on Guildford Road (A323). During both morning and evening rush hours, there are high volumes of traffic, in both directions, making it extremely difficult to leave our drive, or cross the road on foot. At times the traffic can become stationary in either direction. This problem is increased whenever there is a problem on the A31, A3 or A331. This is an incredibly frequent occurrence! There have been a number of accidents on the road between the Fairlands roundabout and Ash, within the last two years. These include more than one fatality and at least one involving a primary school pupil, walking to school.

1. The A46 site is on greenbelt land, a concept which Surrey County Council was instrumental in creating as a means of preventing urban sprawl from linking up towns. In this case Guildford and Aldershot. In addition, this land is not safeguarded.

1. This area is home to a wide variety of wildlife, including many protected species: hedgehogs, newts, bats, dormice, snakes to mention a few. Their natural habitats would inevitably be destroyed by this level of development. Additionally it would lead to light pollution that would be seen from the Surrey Hills Area of Outstanding Natural Beauty.

1. Many parts of the village are already subject to flooding. This development can only exacerbate the problem. There are also areas where the sewers are unable to cope and have overflowed onto residents' gardens.

1. No consideration has been given to the health care of an increased number of residents. It is already extremely difficult to get an appointment at the local surgeries.

1. The area includes a number of Grade 2 listed houses. Surely increased traffic volumes will undermine the strength of their foundations.

To summarise: I consider that if this plan for development in Normandy goes ahead, along with extensive developments also planned for Ash, Tongham and Ash Green, it will be an utter tragedy for generations to come. Once our countryside and wildlife have been destroyed, there is no way back.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to OBJECT to the proposed development at Blackwell Farm.

I object because it is an area of outstanding beauty. It will cause too much traffic in the area. It will impact on the local service such as doctors etc and infrastructure. This will cause pollution problems and noise pollution. It is an area that will impact heavily on the local wildlife. It will also affect ancient woodland and destroy a Greenbelt area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/275  Respondent: 15165665 / Neville Rabin  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I should like to object to the Guildford draft local plan for the following reasons:

Lack of protection for Green Belt.

Removing green belt from 15 villages including Ripley and Send. It will be an urban sprawl.

So many buildings - taking away the green belt - will increase the risk of flooding in the area

Ripley has already had plenty of homes built - disproportionate housing development. National guidelines state it must be proportional to its locality.

Infrastructure cannot cope. Now there are not enough school places, doctors appointments take 2-3 weeks, public transport is being cut.

Traffic concerns on A3 and M25 which are at capacity now. Most weeks, there is a problem on the roads, our village and local roads see increased traffic. Making the local road less safe for pedestrians and cyclists.

Air pollution from thousand of extra cars, affecting children and the elderly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/398  Respondent: 15165697 / Siobhan Sagar  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Air pollution from thousand of extra cars, affecting children and the elderly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am a tenant at the Aldershot Road allotments. I fully support this site being retained if not extended for allotment use.

My reasons are, I had a breakdown in 2014 and have suffered cognitive disfunction and memory problems as a result. My allotment has been an absolute godsend for my mental health recovery and thus my physical health. I cannot extol the virtues of this community activity enough. Not only being outside but producing crops and meeting all sorts of people from all walks of life and ages with one common aim and hobby, that of growing our own produce to benefit our health.

Aldershot Road allotment site is a sanctuary for myself but many other allotment users. The site is very friendly and allotment holders help each other out and provide both physical assistance but also advice to newcomers. The social aspect of this is enormous for those of us on the site. We have many elderly tenants who clearly thrive on not only the physical aspect of maintaining their allotments but also in being able to converse with individuals and share a common love of gardening. This is enormously beneficial to physical and mental welfare and thus keeping people out of the NHS system.

Adjoining the allotment land to the north between our site and St Josephs school I believe has been ear marked for development for housing. I think such sites are essential for brown field development and the new occupants will benefit from having the allotments beside them.

However, I am deeply concerned about the vehicular access and egress from the allotment sites both during and after construction. My reasons for concern are that with so many elderly tenants I fear that if they were not able to either use the parking spaces provided or gain vehicular access to their plots they will cease holding their plots. This will be detrimental to their physical and mental welfare and detrimental to us as a gardening community as their knowledge will be lost, which they so readily impart to young allotment holders. We also have a significant number of young mothers with toddlers in prams who work their plots. The removal of vehicular access to the site would also put them off from holding allotments.

This also will be detrimental to health and the ongoing education of their children about where food comes from etc. In this day and age where we are all acutely aware of the lack of knowledge amongst children about how food is grown and where it comes from etc, this education is crucial, as can be demonstrated by the St Josephs plot. Families working plots together is a joy to behold as the bonds within the families are enriched from this organic process. My biggest concern however about the retention of vehicular access from the bottom of the site is for emergency vehicles. The site needs to enable swift access and egress to such vehicles as with an ageing community on the allotments I have no doubt that we will need this facility at some point.

In any plan for the redevelopment of the old “Puttocks” site, please can there be retained vehicular access and parking for allotment holders to enable this thriving community to continue and keep our elderly tenants active both mentally and physically thus saving the public purse money from not being in the NHS system.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

With regard to your recent plan dated 6th June 2016, I would like to voice my strongest disapproval.

We hold a position just off 2 major thoroughfares (A3 and M25), with a good balance of small local shops to serve the small community, and I and neighbours strongly believe that there are not enough amenities nor infrastructure to cope with the surge in proposed development, as well as the surge in construction traffic considering that will more than likely not be using those 2 major roads; hence we will be trapped in a traffic nightmare for the length of construction!.

In view of the latest Brexit Vote, in which our migrant population should be reduced, and a likelihood of a dip in National and Local GDP, I cannot see for a need to build so many new houses, firstly without a massive burden on indigenous Horsley Villagers, from a Financial perspective, and lastly from a necessity point of view.

I urge you and the Guildford Borough Council to reconsider.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the 2016 Draft Local Plan by Guildford Borough Council (GBC) for the following reasons:

**Erosion of the Green Belt**

I object to the proposal to remove (“in-set”) Ripley, Send and Clandon from the Green Belt.

No one in this county, let alone this nation voted for destroying the Green Belt. We already live in one of the most overcrowded parts of the country. Roads are congested, schools are full to capacity and hospital waiting times are a joke. Just to drive out of our village in the morning can take up to 15 minutes to cover a few hundred meters. This is stressful and will only get far worse with more houses.

We are filled with despair at loosing what we have worked all our life so hard for. We have worked hard to ensure our family live in “England’s green and pleasant land” (something that was even shown as a virtue of our nation in the Olympic opening ceremony), away from the suburban sprawl. All this is in jeopardy with this plan.

By building more and more houses, this will not only further congest an already congested road network, but the overcrowding will create further pressure on schools, hospitals, and other services, all of which will require more people to be employed, which will probably result in a further round of house building and so on. What is GBC doing to consider the wellbeing of their constituents? Was not happiness and wellbeing also on our Prime Minister’s agenda?
High volumes of traffic and congestion have negative effects. These include road collisions, the severance of communities, the costs of delays and the unreliability of journey times to people and businesses. Environmental impacts include traffic noise, air pollution and amenity issues. At a global scale, vehicle emissions contribute to climate change. Some parts of the major roads in Surrey operate significantly beyond their capacity, resulting in traffic congestion, and forcing drivers down rural / country lanes to avoid main roads, leading to further congestion and road accidents.

Disproportionate size of sites in relation to rural locations

I object to the allocation of land to the strategic sites of Garlicks Arch (Ripley/Send border), Gosden Hill (Clandon) and Wisley Airfield. The proposed development of these sites will have a disproportionate impact on the surrounding local villages. They will have a permanent and negative impact on each of these communities.

Unbalanced allocation of development in one area of the Borough

Between the M25 and Burpham, a distance of only about 5 miles it is proposed that over 6,500 houses are built. This represents over 40% of the housing proposed in the Local Plan. I object to this area being hit so hard by the allocation of development, which is disproportionate to the rest of the Borough.

I Object to the site A45 The Talbot

This is an unreasonable overdevelopment in a conservation area. Ripley has already been impacted by at least 7 new housing developments in the past 3 years, without any improvements in roads, bus services, schools are medical centres.

I Object to the site A57 The Paddocks

Planning application 09/P/01554 for site A57 was refused permission by GBC, and the appeal was rejected by the High Court in April 2013. Although the site’s continued occupation has been judged completely illegal, no enforcement action has yet been taken by GBC. GBC should take immediate action on the enforcement notices against illegal occupation. The Council should attach high priority to its planning enforcement role and should not stand idle by where there are flagrant breaches of planning rules, particularly on a prominent site like this in a Green Belt / Conservation area.

I Object to the site A43 Garlick’s Arch

Garlick’s Arch is a 100 acre site of Green Belt and ancient woodland which should be protected.

Congestion on the A3 and M25 trunk roads

I object to the development of the strategic sites due to the A3 and M25 already being at capacity during peak hours. Highways England has no plans to look at improving the A3 before 2020. It is therefore not sustainable to identify sites for further development which will worsen the congestion on these motorways and trunk roads.

Congestion on the local village roads and lanes

Our villages are already suffering from severe congestion for much of the day. For example the Newark Lane and Rose Lane junction in the center of Ripley, which at peak hours, is regularly gridlocked due to the volume of traffic, made worse when Ripley High Street (B2215) is used as a detour/slip road when the A3 is jammed. I object to further development which will cause even greater congestion in and around our villages.

Unsuitability of our local roads for heavy vehicles and more traffic

Many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. For example, part of Newark Lane which was resurfaced for the 2014 Olympics cycle route and has been used subsequently for other cycling events, has had to have regular “fixes” to crumbling road surfaces and recurring potholes due to traffic volumes far in excess of the road surface quality used. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.
Poor air quality concerns

Further congestion, particularly in built up residential areas will only lead to greater levels of air pollution. I object to further development, which will result a fall in the air quality.

Sites being planned in unsustainable locations

Many of the strategic sites e.g. Wisley Airfield and Garlick’s Arch, are in unsustainable locations. They do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. I object on the grounds that these sites are not sustainable.

Parking issues in local villages caused by larger population

Many of the affected villages, such as Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems, to which I object.

Local healthcare facilities will be overwhelmed

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. I object to the further stress it will put upon existing overstretched health services.

Local schooling facilities will be overwhelmed

Without proper planning and a commitment to fund new schooling, existing schools will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. I object to the further stress it will put upon existing overstretched schools.

No protection of the environment and heritage assets

I object to the lack of protection of the environment and heritage assets.

I object to the lack of any evidence for the alleged housing need numbers

Nowhere in the Plan document can I find an explanation for why new houses need to be built other than the obvious that there are too many people. GBC should not punish local residents for the errors of central government in controlling immigration. Its residents will applaud GBC for standing up to central government.

I object to the limited consultation period

The Council, having sneaked this proposal in at the last minute without any consultation whatsoever with the community, has only allotted six weeks to register objections to a document over 1,800 pages, this is half the usual time.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/83  Respondent: 15166017 / Richard Ollington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the 2017 Revised Local Plan by Guildford Borough Council (GBC) for the following reasons:

1. Housing at Site A43 Garlicks Arch would be on Greenbelt Land.
2. The potential increase from 400 houses at site A43 Garlicks Arch is extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages.
3. The inclusion of 6 Travelling Showpeople plots with associated storage facilities is entirely inappropriate in a rural environment within the Greenbelt and there is no identified need within the Local Plan documentation.
4. The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan and so is out of scale with the proposed development.
5. The potential for a substantial increase in industrial floorspace from 7,000 sqm to an unspecified amount at the site A58 Burnt Common does not provide local residents with enough information for a full and proper consultation given the ambiguity and lack of detail within the document.
6. The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, tucked away in policy 4.4.23a and does not allow for full and proper consultation.
7. The increase in housing numbers from 45 to 60 at Site A42 in Tannery Lane will have a significant impact on the already highly congested local rural road network around and within Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/286  Respondent: 15167041 / Andrew Radcliffe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I have the following concerns.

1. There is significant concern in the community that flooding could become more likely as a result of the proposed development. I would find it unacceptable for any proposed development to increase flood risk to existing properties. I would expect the council to place an onus on the developer to fund all additional works to mitigate the effect of the development and ensure an improvement in the water handling capacity of the local land and water management infrastructure.
2. Having attended the community meetings about the proposed development I have seen no clear evidence to suggest that the village of Normandy is in need of a secondary school. I have been provided with evidence to suggest that there is already excess capacity for schooling places within the borough of Guildford and therefore the premise to build a new school on the suggested site is purely a proposal of convenience to enable development on this piece of green belt land. This is quite wrong and should not be allowed.
3. No other consideration or proposal has been provided as an alternative to build on alternate brownfield sites within the borough of Guildford. I would like to know if the borough council has decided not to follow this course of action due to a lack of resource within the planning department to manage the corresponding increase
in the number of developments that an exercise such as a brownfield site development plan could create. In my mind tearing up greenbelt due to a lack of resource within the local authority is nothing short of a morally criminal act.

4. I am registered visually impaired and use a guide dog as my mobility aid. I am dependent on my hearing to make a safety choice when crossing the road. The roads in the village are already so busy that I find crossing the road a complex, frightening and protracted experience. The additional traffic created by an additional 1100 homes is likely in my view to make crossing the road from Walden cottages at Westwood Lane and Guildford Road at Westwood Lane and Glaziers Lane impossibly dangerous without the provision of pelican or toucan crossings. The proposed increase traffic at Wanborough station is also likely to make crossing the wide road entrance to the station impossibly dangerous. Please investigate and inform me if the Equality Act 2010 places an obligation on the planning authority to ensure that any proposed development does not substantially disadvantage a disabled person such as myself or other persons within my community. The impact of not being able to cross the road independently would increase my dependence on my carer, it would reduce my ability to seek employment and engage in society

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/287  **Respondent:** 15172545 / Lucy Maxwell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I have the following objections to removing Ripley, Send and Clandon from the Green Belt:

1. **Green Belt**
   - I STRONGLY OBJECT to the proposal to remove Ripley, Send and Clandon from the Green Belt. These are historic villages and there is no sound reason to do this. If this decision moves forward, the Green Belt will be gone forever and the character of the area will be destroyed.

2. **Disproportionate size of proposed development to size of villages**
   - I STRONGLY OBJECT to the size of the proposed developments (e.g. Wisley Airfield, Garlicks Arch on the Ripley/Send border, Gosden Hill in Clandon). These developments are totally disproportionate to the rural villages and will have a catastrophic impact on the local communities.

3. **Unbalanced allocation of development in one area of the Borough**
   - According to the statistics, in the 5 miles between the M25 and Burpham, there is a proposal to build over 6,500 houses. This equates to over 40% of the housing proposed in the Local Plan, which is disproportionate to the rest of the Borough. This is totally unacceptable and I STRONGLY OBJECT to this.

4. **Implications on traffic**
   - Building as many houses as proposed will have a catastrophic effect on the A3 and local roads, many of which are already ridiculously busy and ill-suited to the volume of traffic. How can these roads cope with any more? The site at Wisley Airfield proposed over 2,000 houses which could mean (at the very least) an extra 4,000 cars on the road. Given Highways England has no plans to improve the A3 in the immediate future, how on earth will the surrounding villages be able to cope? For this reason, I STRONGLY OBJECT to the development proposed in the Local Plan.

5. **Congestion on the local village roads**
   - Following on from #4, the villages are already at capacity from the sheer amount of traffic we currently
experience. The parking situation on the high street and surrounding roads is not sustainable. More traffic on our roads from these proposed developments leading to a larger population would be disastrous. I STRONGLY OBJECT to further development which will do nothing to help with the current congestion or parking issues we currently face.

6. **Unsuitability of our local roads for heavy vehicles and more traffic**
   The surrounding villages around these strategic sites have a lot of country lanes which are very narrow and often allow for only 1 car to pass at a time. The local roads are not in an optimal condition either which would only get worse with more traffic. For these reasons, I STRONGLY OBJECT to the development proposed in the Local Plan.

7. **Impact on air and noise pollution**
   Increased traffic on the road will simply mean more pollution, both air and noise. For this reason, I STRONGLY OBJECT to the development proposed in the Local Plan.

8. **Lack of proper infrastructure**
   As with all large housing developments, no thought is ever given to the current infrastructure. Schools and doctors' surgeries, to give just 2 important examples, are already at breaking point so how will building the amount of houses proposed in the Local Plan alleviate this? Much more thought has to be given to the local existing residents and impact on their quality of life. For these reasons, I STRONGLY OBJECT to the development proposed in the Local Plan.

9. **Impact on utilities**
   The villages that surround these strategic sites are already close to capacity in terms of the electrical network and sewers so building a development such as Garlick’s Arch will have a catastrophic effect on these essential utilities. For this reason, I STRONGLY OBJECT to the development proposed in the Local Plan.

10. **Lack of public transport**
    The sites at Wisley Airfield and Garlick’s Arch are in totally unsustainable locations as they are not close to railway stations. The bus timetable between Woking and Guildford is being reduced even further this year so that in turn means residents are going to be more reliant on their cars. For this reason, I STRONGLY OBJECT to the development proposed in the Local Plan.

11. **Impact on local policing services**
    With funding being cut to police services, how will building large developments, such as Garlick’s Arch and Wisley Airfield help? For this reason, I STRONGLY OBJECT to the development proposed in the Local Plan.

12. **Impact on the environment**
    Destroying the Green Belt and beautiful greenery/woodlands in these historic villages around the strategic sites will have a catastrophic effect on wildlife and nature. This is completely UNACCEPTABLE and there appears to be no consideration for issues these developments will cause the conservation areas or Special Protection Areas. For this reason, I STRONGLY OBJECT to the development proposed in the Local Plan.

13. **No protection of heritage assets**
    I STRONGLY OBJECT to the development proposed in the Local Plan as I don’t believe there has been any consideration for the protection of our heritage assets.

14. **Insufficient pedestrian footpaths/cycle lanes on local roads**
    With increased congestion which will be caused by building large sites, such as Wisley Airfield or Garlick’s Arch, this will have major ramifications for existing residents. Our footpaths are insufficient now so increasing the amount of vehicles on the roads will increase the danger to pedestrians. There are many cyclists who like to use the local roads, for which we don’t have cycle lanes. Is it worth risking human life to build such unsuitable developments? For this reason, I STRONGLY OBJECT to the development proposed in the Local Plan.

15. **Consideration for local communities**
    By allowing these ridiculous developments in totally unsuitable locations, such as Wisley Airfield and Garlick’s Arch, we are in danger of destroying local communities that have existed for years. The villages around these strategic sites are not suitable for turning into towns – for reasons stated above, the infrastructure and local amenities will not cope with a larger population. The needs of the local communities MUST come first. Once the Green Belt land is gone, it is gone forever. The South East is being paved over by greedy property developers who have no knowledge of the local areas. For this reason, and all reasons stated above, I STRONGLY OBJECT to the development proposed in the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<tr>
<th>Comment ID: PSLPA16/3688</th>
<th>Respondent: 15172641 / Michael Heard</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
<td><strong>I object to the Strategic Housing Market Assessment. SHMA figure of 693 houses per annum in the borough being too high (Appendix D)</strong></td>
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<td><strong>These figures are at odds with figures used previously @ 322</strong></td>
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<td><strong>As this figure cannot be verified, the lack of transparency is not right for consultation on the Plan</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
<td><strong>I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)</strong></td>
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<td><strong>The site is not appropriate because, there are no plans to improve schools, surgeries, or utilities.</strong></td>
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<td><strong>Garlick’s Arch is protected from development as Green Belt, and I do not believe there are valid ‘exceptional circumstances’ for its removal.</strong></td>
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<td>I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)</td>
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<td>North facing ramps to the A3 at Burnt Common would be a disaster for local communities. The added traffic passing through Ripley, Send and Clandon would be enormously detrimental, It would not be sustainable as access through these villages cannot be improved.</td>
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<td>I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)</td>
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<td>Living in Newark Lane, I am only too aware of the already overloaded narrow country roads - local development on the scale proposed would be unsustainable.</td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
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I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

As it is clear that no improvements to the A3 or M25 would be possible before 2020, no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15540  Respondent: 15172641 / Michael Heard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to poor air quality concerns (Policy I3)

The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on the health of local residents especially the young and elderly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/867  Respondent: 15172641 / Michael Heard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to lodge my strong objection to the Draft local plans.

The Councils disregard for the Protection of the Green Belt is of great concern to me.

The proposed removal of the villages from the green belt,

will potentially allow disproportionate housing developments to be built.
These large developments bring with them a huge demand on already stretched local resources, overloading schools, health services and transport systems.

The already overcrowded roads, will potentially see thousands of additional cars and commercial vehicles flood into the villages, where the lanes were never designed to accommodate them.

This brings with it the problem of pollution, which is a particular problem for the young and elderly.

I have regularly been dismayed to discover that these developments with the promise of 'affordable housing' are far from 'affordable'
with very little chance of young families, or local people being able to afford them.

As a Surrey resident for 33 years, I feel that the threat to Surrey and the villages surrounding Guildford has never been greater,
do not destroy our heritage, and that of future generations by allowing the destruction of Surreys Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15535  Respondent: 15172641 / Michael Heard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object most strongly to the proposal to remove Ripley Send and Clandon from the Green Belt.

There are Brownfield sites that could be utilised, ie at Burnt Common, before considering Green Belt development at Garlicks Arch and Wisley Airfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
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<th>Comment ID: PSLPP16/15538</th>
<th>Respondent: 15172641 / Michael Heard</th>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong></td>
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<tr>
<td>I object to development in areas which are at risk of flooding (Policy P4)</td>
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<tr>
<td>The Plan does not take adequate account of flood risk. It appears that the Council’s assessment of the flooding risk is flawed.</td>
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<tr>
<td>The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s assessment.</td>
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<td>This area has flooded many times in recent years.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong></td>
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<tr>
<td>I object to the Local Plan as the development proposed is not sustainable (Policy S1)</td>
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<tr>
<td>The proposed mass housing developments will damage local communities, especially Ripley, Send and Clandon.</td>
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<tr>
<td>The development is better suited to urban areas that can provided transport links, these plans are not for local communities, we do not have good rail links, and quite poor bus services, so that means more cars on the local roads.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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</table>
I object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; 36% of all the Plan’s new housing is proposed in the Ripley Send Clandon area,

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages, this mass urbanisation of Surrey villages is deplorable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/868   Respondent: 15172673 / Michael Brown   Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not want more building in this area. I am having trouble breathing now Yes, I have a council flat and when I die someone else can have my flat so stop selling council property. These were built for the working man and should be kept as such

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/903   Respondent: 15172705 / Geraldine Brown   Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposal in the local plan on the grounds that the Southern County Searches (Sitescope Ltd) report E.29*78.SN_HCP dated 5th January 2005-identifies proposed site GBC recorded landfill site ref GU/12 with a type of waste identified as 'unrestricted'. This causes me concern as to what it does contain and dangers if disturbed.

I object to the proposal in the local plan on the grounds that the Traveller Accommodation Assessment research, purported to have been undertaken in June-July 2012 by Mill Field services, cannot be so. The Sittingbourne based market research company was dissolved in January 2011 according to the government companies site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/869    **Respondent:** 15172705 / Geraldine Brown   **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I am raising objections to the Local Plan. It's far to much building with the infrastructure we have at the moment. I agree that we could do with some more houses, flats and bungalows for the disabled, but these should be council owned for the average working man. About 200 per village should do it. More cars means traffic pollution and I suffer badly from air pollution.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp172/286    **Respondent:** 15172705 / Geraldine Brown   **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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POLICY A42

Clockbarn in Tannery Lane because 33% increase in the number of houses on that land is too much. Where are all the children going to go to school? You've pulled down the school and placed the children in a eyesore of a school. The playground is so small the children can't run around without banging into someone.

It ignores all the previous complaints against the plans.

Tannery Lane is way to narrow to cope with the flow of traffic in that area.
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<td>Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

POLICY A43

Land at Garlicks Arch, Send Marsh

Do we in Send really need 400 homes? They won't be affordable to the young of the area which means my youngsters will be pushed out. As far as I know the travelling showman live in the Dorking area not Send. Any residents in these houses you plan on building won't like the big diesel vehicles and generators travelling in and out. Now we know diesel is a dangerous polluter why put them in an area with houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Answer (if comment is on questions 1-7 of the questionnaire): ()

GUILDFORD PROPOSED LOCAL PLAN 6/6/2016
FIELDS BEHIND SHALFORD VILLAGE HALL

Although a resident of Dunsfold but a member of Shalford LTC I wish to make known my objections to the current version of the local plan which removes the fields behind the Village Hall and Tennis Club from the Green Belt and puts them in the Shalford settlement boundary.

Although these fields have been classified as “open spaces” there is no confirmation to say that this would give them the same degree of protection as the Green Belt from housing development.

Any Construction on these fields which is 25ft above the village hall would tower over the tennis courts and bowling green and totally destroy the Green aspect of the village.

The considerable traffic from a development would have to exit on Chinthurst lane not only adding to the traffic chaos and pollution but increasing the potential for an accident.

By implementing a small adjustment back to the 2003 boundary GBC could protect these fields and ensure they remain open spaces.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )  

Answer (if comment is on questions 1-7 of the questionnaire): ()

This section of the document is not sound because it fails to address serious concerns about pressure on road infrastructure. Traffic congestion in the immediate vicinity (Westwood Lane, A31, Puttenham Heath Rd, Aldershot Rd etc.) has been increasing month by month. If each proposed household within this section were to own just one car, the impact of 1,000+ cars on local roads would be entirely unsustainable, whether they were used for the daily commute to work, for ferrying children, for shopping or for pleasure. The congestion referred to above occurs at all times and is not restricted to the normal rush hours. Non-residents coming into the area (visitors, teachers and parents of children at the proposed school etc.) will place further pressure on local infrastructure.
The area referred to in this section of the document is prone to flooding and has been under water within the past 24 months. It is difficult to see how this propensity to flooding can be resolved in a way that will prevent risk of flooding either to the proposed houses or those in the surrounding area.

The development proposed in this section of the draft plan would alter significantly the nature of the immediate surrounding area, providing a densely populated settlement outside the boundaries ofGuildford town in what is still largely a rural area. Combined with plans for other sections of this document (A47: land to the east of the Paddocks plus new traveller and show people's sites in Normandy) and planning applications already under consideration e.g. proposals for some 80 houses at Wyke, this major development proposal would change entirely the nature of this area rich in wildlife, natural woodland and vegetation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/358  Respondent: 15174145 / Kathleen Mylet  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8) I object to the Infrastructure Schedule (Appendix C)
   The Plan takes no account of the infrastructure needed for the Garlick's Arch site.
   e.g. utilities, sewerage and local services.

9) I object to the lack of provision for increasing the size of the local Medical Centre.
   The Villages Medical Centre is already full.

10) I object to the lack of provision of additional School places.
    The local schools are being enlarged to take account of the projected figures for the current population of Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/359  Respondent: 15174145 / Kathleen Mylet  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
I object very strongly to Guildford Borough Council's Local Plan dated June 2016.

Below are detailed my objections to policies within the Plan.

1. I object to removing Send, Ripley and Clandon from the Green Belt. (P2)
   There are no unusual circumstances for these villages being removed.

2. I object to the plan to build 400 houses and 7000 square metres of light industrial units at Garlick's Arch, Sendmarsh, Ripley. (A43)
   Garlick's Arch is protected from development as Green Belt.
   Also, it is an Ancient Woodland with trees going back to the 16th Century and is full of wildlife.

3. I object to the creation of a 4-Way Junction with the A3 at Burntcommon. (A43a)
   This would be a disaster for Clandon, Sendmarsh and Send, leading to Gridlock in these villages.

4. I object to building in areas where there is a risk of flooding. (P4)
   The land at Garlick's Arch has been classified by the Environment Agency as being at risk of flooding.
   The field at Oldlands farm is often under water.

5. I object to the disproportionate amount of development in one area of the Borough. (S1)

6. I object to the last minute inclusion of new sites with less than two weeks notice.

7. I object to the poor quality of air concerns. (P13)
   Noise and air pollution is already bad.
   With the additional houses being built and resultant extra traffic likely to cause extremely poor air quality to residents in properties adjoining Portsmouth Road.

8. I object to the Infrastructure Schedule (Appendix C)
   The Plan takes no account of the infrastructure needed for the Garlick's Arch site.
   e.g. utilities, sewerage and local services.

9. I object to the lack of provision for increasing the size of the local Medical Centre.
   The Villages Medical Centre is already full.

10. I object to the lack of provision of additional School places.
    The local schools are being enlarged to take account of the projected figures for the current population of Send.

11. I object to our Villages being turned into Towns.
    We bought our properties because they were in a village and we liked the Village atmosphere.
12. I object to the lack of any evidence of the alleged housing need numbers. (S2)
13. I object to the erosion of the Green Belt.
14. I object to the limited Consultation Period.
15. I object to the fact that Guildford Borough Council has not followed the Correct Process in their dealings with the Public in putting forward the Guildford Local Plan 2016.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/478    Respondent: 15174145 / Kathleen Mylet    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

2) I object to the plan to build 400 houses and 7000 square metres of light industrial units at Garlick's Arch, Sendmarsh, Ripley. (A43)

Garlick's Arch is protected from development as Green Belt.

Also, it is an Ancient Woodland with trees going back to the 16th Century and is full of wildlife.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/479    Respondent: 15174145 / Kathleen Mylet    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

3) I object to the creation of a 4-Way Junction with the A3 at Burntcommon. (A43a)

This would be a disaster for Clandon, Sendmarsh and Send, leading to Gridlock in these villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/1062  Respondent: 15174145 / Kathleen Mylet  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to our Villages being turned into Towns.

We bought our properties because they were in a village and we liked the Village atmosphere.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1058  Respondent: 15174145 / Kathleen Mylet  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object very strongly to Guildford Borough Council's Local Plan dated June 2016.

Below are detailed my objections to policies within the Plan.

1) I object to removing Send, Ripley and Clandon from the Green Belt.(P2)

   There are no unusual circumstances for these villages being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1063  Respondent: 15174145 / Kathleen Mylet  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
13) I object to the erosion of the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

4) I object to building in areas where there is a risk of flooding. (P4)

   The land at Garlick's Arch has been classified by the Environment Agency as being at risk of flooding.

   The field at Oldlands farm is often under water.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

5) I object to the disproportionate amount of development in one area of the Borough.(S1)

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7) I object to the poor quality of air concerns. (P13)
   Noise and air pollution is already bad.
   With the additional houses being built and resultant extra traffic likely to cause extremely poor air quality to residents in properties adjoining Portsmouth Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/283  Respondent: 15174145 / Kathleen Mylet  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6) I object to the last minute inclusion of new sites with less than two weeks notice.

14) I object to the limited Consultation Period.

15) I object to the fact that Guildford Borough Council has not followed the Correct Process in their dealings with the Public in putting forward the Guildford Local Plan 2016.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/586  Respondent: 15174145 / Kathleen Mylet  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy A42 at Clockbarn Nursery, Tannery Lane. An increase of 33% on the number of houses to be built is outrageous. The road is too narrow and difficult to traverse most days without adding even more houses to the original plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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Below are my objections to the above plan:

1. I object to the excessive number of houses proposed for the Garlick's Arch site, Policy A43 changes.
   It will ruin the character of both Send and Ripley.
   The extra traffic generated by the new residents will lead to chaos on the local roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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</table>

1. I object to Policy A58 at Burntcommon because there is no need for additional industrial or warehouse development, in the middle of the Green Belt, when there are loads of empty sites at Slyfield and Guildford.
   It will have an adverse effect on the narrow roads of Send and will lead to gridlock.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<tr>
<td>Just writing to object to the planned building on greenbelt land. Our green belt land is precious, and one of the things that makes Surrey so special and should not be destroyed. Especially when there is not the road infrastructure to deal with the extra traffic to the town</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<tr>
<td>I must protest with the loudest voice possible, that the plans to build 14,000 more houses be refused. Guildford cannot cope, there is insufficient infrastructure, not enough school places (or teachers), enough doctors to fill vacancies in GP surgeries. The roads cannot cope, it took me 50 minutes the other day to go from Merrow to the A3 via Ladymead. These plans are untenable and MUST be stopped.</td>
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<th>Respondent: 15176001 / Lynda Skeldon</th>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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</table>
Please note my objection to housing on the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/889  Respondent: 15176097 / W J Wortt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have recently been reminded that included in the local plan is the proposal to build an additional 14000 homes within the borough.

I have several objections to this: -

1/ None whatsoever should ever be built on land designated as Greenbelt. This will ruin the existing beauty of the borough.

2/ The additional housing is not what the existing residents want, it will lead to overcrowding and the existing infrastructure cannot cope. It would be far better to let people live in plentiful existing housing which is available in other parts of Britain.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/292  Respondent: 15176129 / Harry Strudwick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing with reference to the final draft local plan and would like to raise my objections.

With reference to the policies P2, A42, A43, A43a and A44 I object for the following reasons.

Policy P2 - Send is a small village community on the edge of Woking and it provides a buffer between the town and the open countryside. To remove Send from the Greenbelt is a short-sighted act of lunacy. Greenbelt is designed to provide...
protection from urban sprawl and to erode it in this way is irresponsible and indeed there were repeated specific election promises to protect it.

We are all custodians of our countryside and it needs protecting from reckless planners for future generations.

I object to the large number of houses proposed in the plan on all of the sites. The increased population will undoubtedly place extra traffic onto roads which already struggle to cope with the current population. The A247 through Send is a small road in a bad state of repair due to traffic loading. During certain periods of the day the traffic queues back for more than a mile and as soon as any maintenance or service works are undertaken the road becomes realistically impassable during peak periods. The village of Old Woking provides a bottle neck for traffic heading toward Woking and Maybury and increasing population in Send and beyond will only exacerbate the situation. Moreover, I am a young adult who drives and has been a victim of a road traffic collision (RTC) on the roads in Send, in their current state, due to the reckless driving of others. Therefore, not only will an increase in congestion occur, it may also result in an increase in RTCs.

Policy A42 – I object to the building of 45 houses at Clockbarn Nursery. Apart from this area being subject to potential surface water flooding this will just bring more traffic onto the A247 Send Road or feed it through narrow and single track rural roads towards Newark Lane.

Policy A43 - I object to the proposed employment space at Garlick’s Arch for the same reasons as above. The increase in HGV traffic, should this go ahead, will cause more congestion and damage to the roads in and around Send. I also object to the proposed 400 houses. This is a new site that has not previously been consulted upon; it was not included in the Regulation 18 draft. There is no need for these additional houses on top of the thousands already proposed for the borough.

Policy A43a - I object to the proposed A3 junction for reasons of additional traffic congestion, damage to existing roads and reduced air quality and increased pollution.

Policy A44 - I object to the proposed development for housing and travellers pitches in Send Hill for the following reasons. This is again a newly identified site and was not included in the Regulation 18 draft; it has not previously been consulted on and is therefore inappropriate to include it in this consultation.

Send Hill is a quiet residential road surrounded by countryside. There is insufficient access to the proposed site, it is inappropriate for the proposed purposes and not in keeping with the area. Indeed other private local planning applications have been turned down for this reason. The subsoil of the site contains documented unsafe landfill waste which is currently vented. The road is narrow, single track in places, with no footpaths and as the road is straight it is already used as a rat run for some vehicles to cut through to the A3. In addition to this, the dumping of rubbish on these narrow back roads, which seems to be deemed appropriate by some, is disrespectful, despicable and out right dangerous. On a walk the other day, my family and I came across such an incident on a blind corner (please see the photo evidence below), on which new residents and travellers and indeed the older population of this area, may drive quickly around presuming it is safe and yet again be the cause of more RTCs and potentially life threatening incidents.

(see photo in attached PDF)

The road is used by the George Abbott school bus and many school children walk along Send Hill to meet the bus at the junction with the A247. Additionally younger children walk with families to attend the primary school currently in Bush Lane at the end of Send Hill. Even when the school moves to its new site the children will still be walking along Send Hill to attend it. Increased housing and the resulting traffic will place these children at added risk. Indeed rather than building more homes Send Hill should be subjected to traffic calming measures to protect the children who walk to school and other residents.

Send Hill is home to a number of bats who require protection from development and there are native bluebells in the woodland which also need to be protected.

To conclude my objection to the plan I would like to mention the local services such as health centres and schools which are already under a huge burden.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Picture attachment Harry Strudwick.docx (210 KB)

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Comment ID: PSLPA16/293  Respondent: 15176161 / Linda Fielding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/892  Respondent: 15176161 / Linda Fielding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of immediate provision for new schools.

I object to the lack of any immediate provision for Doctors Surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/890  Respondent: 15176161 / Linda Fielding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all erosion of the Green Belt.
I object to any in-setting of any villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate amount of development in one area of the Borough.
I object to the limited consultation period.
I object to the last minute inclusion of new sites with less than 2 weeks notice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I would like my comments to be seen by the Inspector please

I object to the local plan as it pertains to the village of Send as it threatens to seriously and adversely affect the village where I have lived for over 25 years.

I understand the need for more housing, but I believe there is still scope to build on 'brownfield' sites, and particularly within Guildford where they are most needed. Some extra housing in Send would be acceptable, but the sheer number of houses (485) proposed in this small village is not feasible without seriously undermining the character of the village and overwhelming the current infrastructure. In particular the road through Send is already congested during rush hours, and this would become a major bottle-neck. The proposed enhancement of the junction with the A3 also threatens to increase traffic levels through the village. We would also need more facilities both for schooling and medical support which do not appear to have been adequately considered in the current plans. I also object to Send being removed from the green belt. This is an open invitation for further in-building which would further aggravate the situation, and appears to be totally unnecessary to fulfil the identified objectives. Further, the housing proposed both in Send and all along the A3 threatens to undermine the rural nature of the area in which we live. The green belt is there for a purpose to give in this case a barrier of green between Woking and Guildford. I attended the meeting in June in Send and as horrified by the plans for more houses both here in Send and at Merrow - Policy A25 and I object to these proposals.

This area is in danger of being spolit for future generations.

I look forward to your reponses to these objections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8296  Respondent: 15176769 / C McCleery  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A39

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the settlement boundary being moved from behind the houses on the west side of Kingston Meadows being out of the Green Belt.

Kingston Meadows are very well used by many people of all ages. It is in the centre of the village for all people to have easy access and will be needed more when Horsley expands to meet housing needs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/899  Respondent: 15176769 / C McCleery  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4
Local and national celebrations are held there e.g. Queen's Birthday, village days or more. It provides sports facilities - cricket, football, tennis, kiddies playground and gymnastic equipment and a cycling track. Many people use this place to walk their dogs. All this makes Kingston Meadows a very important social asset and is important to village life.

This should be preserved and kept in the Green Belt to keep it safe for the future.

I wish to register my OBJECTION to the new Local Plan and in particular its effect on the Green Belt which the conservatives vowed to protect in their election manifesto.

In particular:

1. I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford and is the whole purpose of the Green belt.
2. I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.
3. I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.
4. I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.
5. I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.
6. I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<td>I object to Policy A42 primarily because it is an erosion of the green belt and will spoil open countryside along the Wey Navigational. In addition the access road i.e. Tannery lane is a narrow country lane with passing places for oncoming traffic. 60 houses with an average of 2 cars per house will put an unrealistic strain on the road. Also the junction of tannery lane at either end is wholly unsuitable to this amount of traffic and will cause traffic issues.</td>
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<td>I object to Policy A43 for various reasons. The tens of thousands of objections already made are simply ignored by GBC. The number of homes is excessive. The junction of the B368 Send Marsh Road and B2215 Portsmouth Road is already extremely difficult to exit particularly when turning right and the c1000 additional cars in Garlick’s Arch will make this whole area a traffic nightmare. Also the whole area of Garlick’s Arch floods every Winter and there is much documented photo evidence of this as there is a clay shooting club who use the area and they regularly shoot over what is essentially a lake. It has a flood zone 2 allocation. There is NO proven demand for travelling showpeople plots in this location.</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A58 because this enormous industrial development is simply not needed. Slyfield estate has empty units and also space to extend into and they want to do it so there will be no objections!! I object to the underhand wording in the plan of changing from a “maximum” 7,000 sq ft to a “minimum” of 7,000 sq ft. This development will also cause traffic chaos in the area. Most mornings when the A3 backs up at the M25 junction people come off at the Send slip onto the B2215 (past this proposed development) and follow it through Ripley trying to cut out some of the traffic queue. This backs up the Portsmouth road causing further issue at the junction with Send Marsh Road and at the roundabout with the A247. A huge industrial park with the associated articulated lorries etc will only exacerbate the problem and make the traffic untenable. In addition if you then create an on/off ramp to the A3 on the A247 then this junction will become the main route into Woking for traffic coming from the South on the M25 and it will result in traffic gridlock. This has not been thought through.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/902  Respondent: 15177345 / Amer Sarssam  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to register my objection to the 2016 Draft Local Plan.

I make the following points:

1. Erosion of the green belt
2. Lack of adequate consultation
3. Insufficient schooling
4. Insufficient transport
5. Insufficient health care
6. Environmental impact on Papercourt Sailing Club, an SSSI area
7. Impact on Papercourt Sailing Club lake water level and water table

Please confirm receipt of this communication and keep me appraised of the decision making process

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/904  Respondent: 15177473 / Judith Sarssam  Agent:
I wish to register my objection to the 2016 Draft Local Plan.

I make the following points:

1. Erosion of the green belt
2. Lack of adequate consultation
3. Insufficient schooling
4. Insufficient transport
5. Insufficient health care
6. Environmental impact on Papercourt Sailing Club, an SSSI area
7. Impact on Papercourt Sailing Club lake water level and water table

Please confirm receipt of this communication and keep me appraised of the decision making process

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The potential increased development would lead to even more traffic using Horsley and Ockham Road North in particular as a cut through to the A3. We have already had numerous incidents with lorries and vans striking pedestrians, striking the railway bridge and driving way above the speed limit. The parish council have complained numerous times but Guildford Council have done NOTHING to address these concerns and therefore the proposed development will make matters even worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1535  Respondent: 15177505 / Iain Guest  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As stated in my previous comment. The current infrastructure is unable to cope and provide a safe environment for people to walk or cycle in Horsley. The proposed development will exacerbate these problems and in reality people will not be able to safely walk or cycle around the village

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1524  Respondent: 15177505 / Iain Guest  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( Yes ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I agree the policy of protecting the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/1525  Respondent: 15177505 / Iain Guest  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( Yes ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I agree the policy

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/315  Respondent: 15177505 / Iain Guest  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not believe the evidence base is appropriate and I do not agree with the interpretation of the statistics. I do not agree it justifies any encroachment/development of the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1527  Respondent: 15177537 / Elizabeth Guest  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I disagree with 4.417 in that Effingham Junction Railway Station should be given PTI status as it serve the local community of East Horsley, Effingham, Cobham & Bookham.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1529  Respondent: 15177537 / Elizabeth Guest Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Although Guildford Borough Council state there will be increased investment in infrastructure we currently see very little of this in East & West Horsley. Roads are at a dangerous level of disrepair which is damaging vehicles which increases the risks of accidents. Drainage is poor particularly on Ockham Road Road where drains regularly flood.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1530  Respondent: 15177537 / Elizabeth Guest Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Roads and Drainage in East & West Horsley are in very poor condition and severely under pressure in our current environment. I fear the dramatic increase in housing will cause even further problems as the Council have failed to resolve the existing issues therefore I do not see an evidence to show this will be improved in the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1532  Respondent: 15177537 / Elizabeth Guest Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
In addition to poor roads and drainage the current infrastructure in East & West Horsley does not support the plan. Although the Council mentioned a new primary and secondary school and even if these were built our roads, rail and public transport wouldn't be able to support the impact causing gridlock throughout the village. Our medical centre in East Horsley is severely under pressure as it is and therefore further extensions would be required however this would only follow in 5-10 year time after massive development has taken place showing a complete lack of support to the community.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

Roads and Drainage in East & West Horsley are in very poor condition and severely under pressure in our current environment. I have particular concerns about Ockham Road North with increased traffic this road will need better drainage and traffic calming measure which local residence have petitioned for with little success. Therefore I fear the dramatic increase in housing will cause even further problems as the Council have failed to resolve the existing issues therefore I do not see an evidence to show this will be improved in the future.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
Although Guildford Borough Council states they will protect the Metropolitan Green Belt which I fully support they then go on to show through analysis in the Appendix that c65% of the development proposed in the Proposed Submission Local Plan are to be built on land currently within the Metropolitan Green Belt. This would lead to the devastation of our beautiful and historic village one being East & West Horsley where over 500 house are proposed on the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** SQLP16/314  **Respondent:** 15177537 / Elizabeth Guest  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

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My concerns relate to the scale of housing proposed and the percentage of which will be in Green Belt. Although Guildford Borough Council have stated they will protect Green Belt they then go on to contradict this whereby stating in the appendix (policy p2) that c65% of the proposed housing will be in the Green Belt. This will lead to ribbon development and our beautiful and historic villages and rural areas will be destroyed. In addition to this I do not see how the infrastructure of our villages can support such development and Guildford Borough Council have provided little comfort on how they will improve rail and road infrastructure in addition to providing other services to support such mass development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** SQLP16/275  **Respondent:** 15177793 / V Smith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I object to the lack of detailed consideration given to consequences of the effect on the flood meadows next to Clay Lane. By building close it will cause immediate water run-off to the meadows and the flood risk is increased dramatically. The meadows already flood during summer months and in winter the water floods across Clay Lane causing traffic build up. If large vehicles require direct access the Slyfield Industrial Estate then additional and closer on and off roads must be provided to the A3 without disturbing the already congested local roads.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
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<th><strong>Comment ID:</strong> PSLPA16/314</th>
<th><strong>Respondent:</strong> 15178113 / Jack Hornblow</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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<td>6) lack of evidence for housing numbers needed</td>
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<td>9) and development at garlic arch</td>
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7) lack of immediate provision needed for new schools
8) lack of any immediate provision for doctors surgery
10) increased traffic that would be cause in which a village such as Ripley already cannot sustain its current demand without long tailback and
11) dangerous sizevehicles manoeuvring in roads that has little or no pedestrian path way due to increased traffic
12) lack of parking in the village for the present day users let alone if more were to be housed

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>2) removal of villages from the green belt</td>
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objects to -

13) the use of countryside areas for which the area is so well know to build more properties

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/915  Respondent: 15178113 / Jack Hornblow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3) disproportionate amount of development in one area of the borough

4) limited consultation period

5) last minute inclusion of new sites with less than 2 weeks to go

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/925  Respondent: 15178241 / Emma Pink  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please take this email as my extremely strong objection to the notion of building houses on any part of the greenbelt or countryside in the Guildford area.

I understand that more houses need to be built, but only on brown sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/320  Respondent: 15178305 / Nancy Shafee  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()


I write to register my objection to the current plan to overdevelop the villages of East and West Horsley endangering their status as villages and trying to turn them into small towns.

Primarily my objections are as follows:

Infrastructure

The roads in the Horsleys are coping with considerably more traffic than they were designed for.

In particular East Road/The Street running through West Horsley between the A246 and Ockham Road is frequently congested with cars queuing back along the road at both ends, worse at busy times of the day.

Ockham Road from The Drift intersection up to the station is particularly busy with business and school traffic.

These roads are now too busy to be safe for young cyclists who should be able to cycle to school in a so-called village.

Ripley Lane and The Drift are in poor repair as are stretches of East Road/The Street and further heavy traffic will be detrimental.

The junction with the A3 at the Wisley roundabout is already dangerous with cars queuing back to the roundabout at busy periods and drivers taking unacceptable risks to get into the middle and outside lanes of the northbound A3 to avoid the queues up to the junction with the M25.

There are few buses through the villages. Each new house is likely to have at least one, and probably two cars.

Has anyone thought of the impact all this extra traffic will have on air quality or doesn’t our health count?

There appears to be no evidence to support consideration for additional parking in the villages, at the station, shopping paraes or the village halls for all these additional residents.

Drainage and surface water

Housing plans recently have run into difficulties with the disposal of surface water. Additional foundations can only encourage further surface water to gather. On roads this often causes drivers to swerve into the oncoming traffic to avoid stretches of deeper water. Furthermore surface water on the roads is not safe for cyclists, nor pleasant for pedestrians.

Has anyone thought of the stress so much additional housing will cause to the waste water systems?

Education & Healthcare

When we arrived in West Horsley 20 years ago we couldn’t get our children into the village school. A recent telephone call to the secretary of The Raleigh confirmed it is still the case that local children frequently have to travel many miles to school. I find there are no plans to increase provision for schooling within the Horsleys. How are new families to be accommodated without causing further traffic upheaval?
We already have to be ‘ill by appointment’. It has been impossible to get an appointment with one’s chosen doctor within one week, and often much longer. In the holiday months one can wait considerably longer to see one’s chosen GP and often the wait for a physio referral is upwards of six weeks.

East and West Horsley are VILLAGES, among the last remaining examples near London. They are not dormitory offshoots of Cobham and Guildford which is what they will become if these plans are allowed to go through.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/321  Respondent: 15178369 / Geoffrey Wilkinson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the proposal to create a four way junction on the A3 at Burnt Common (Policy 43A) by extending north and south access as this will increase traffic enormously on the A247 which is already at full capacity through Send at peak times and experiences huge traffic jams when even minor road works are required along its length. This new junction would result in Send being used as a cut through to the A3/M25. The proposal will also increase the volume of traffic on the A247 through West Clandon which is totally unsuitable for any significant volume of HGV traffic due to a very narrow stretch within the village where two large vehicles are unable to pass each other.

- I object to Policy A43 Garlick’s Arch as this substantial development was included in the Draft Local Plan at the last minute with less than two weeks’ notice and with insufficient consultation.

- I object to Policy A43 Garlick’s Arch, as the proposal to build at least 400 homes and industrial facilities will not only put impossible pressure on the existing road network, but other infrastructure such as schools and medical facilities will be insufficient to support this development. The Villages Medical Centre in Send is already at capacity and there is no secondary school proposed for Ripley and Send which even now causes problems for many children who are unable to get in to the already oversubscribed closest secondary school George Abbot in Burpham.

- I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Ripley and Send.

- I object to the removal of Send and Ripley from the Green Belt because the villages and their countryside provide a necessary buffer between Woking and Guildford.

- I object to all proposals to build on the Green Belt in Send, Ripley and elsewhere in the borough because all future required development can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.

- I object to the proposal to remove Ripley, Send, Wisley, Clandon and other villages from the Green Belt as this will open up these villages to even more excessive development and will destroy much of the existing open
landscape and countryside, potentially creating a continuous urban development from the M25 down to the A31 Hogs Back.

- **I object** to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

- **I object** to the complete failure of Guildford Borough Council to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I object to the 2016 Draft Local Plan on the grounds that:

- infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.
- the proposed development is disproportionate to the capacity of the area affected to accommodate it.
- amounts to an excessive development within one area of the Borough and is contrary to the Borough’s stated objective of ‘balancing the needs of residents with protecting the borough’s most important countryside, landscape and heritage’.

In particular, I object to the following proposed sites and developments:

- Policy A43 Garlick’s Arch plus Clockbarn Nurseries and Send Hill; they are not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded.
- Policy A35 Wisley; it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads.
- Policy A25 Gosden Hill Farm Merrow; infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels.
- Policy 43A - the proposed new interchange onto the A3 at Burnt Common.

The combined effect of these substantial proposed developments within close proximity will place an unsustainable burden on the infrastructure of the areas affected. The surrounding roads are already extremely busy and in particular the resulting increase in traffic on the A3 and M25 will be disastrous. The A3 is already at a near standstill on the approach to the M25 during the morning peak time and this will become substantially worse by the construction of upwards of four and a half thousand houses, plus commercial/industrial units on these three sites combined. In addition, this will particularly result in the village of Send being gridlocked all day.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>The 2017 Draft Local Plan now proposes an increase in the development envisaged in the 2016 Draft Local Plan. 60 homes are now planned in place of the 45 homes originally proposed– an increase of one third. This completely ignores previous objections to the traffic problems which will be caused by this development on a site which is served by very narrow roads and the increase in the number of homes now proposed can only make matters worse. It will also increase the impact of surface water flooding which is already a problem in this area.</td>
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<td>Far from reducing the number of homes proposed for this site, the Council have again ignored substantial objections made regarding the impact of this site and have also added a proposal for six travelling show-people plots. This despite there being no proven demand for this number of plots in this location. The proposals for this site are excessive, represent a substantial erosion of the Green Belt, and will generate huge amounts of traffic which the road system in Send and Ripley is completely unfit to cope with.</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
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Again, despite numerous previous objections, the Council have now allocated this site for a **minimum** of 7,000 sq. m of industrial space, instead of the previous **maximum** of 7,000 sq. m, thereby creating the opportunity for unlimited development on this site in the future. These proposals are an unnecessary and inappropriate development within the Green Belt and will only increase the existing traffic gridlock in this area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/405  **Respondent:** 15180193 / Paul Bedworth  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

9.) I object to the lack of consideration of infrastructure improvement. It does not make any sense to have a plan that effectively merges all villages along the A3 from Wisley to Blackwell Farm. In order to make it sound, very significant infrastructure improvements would need to be made, including, but not restricted to, completely rebuilding the A3/M25 intersection to make it freer flowing and an additional lane to be added to the M25 in either direction. The A3 through Guildford would need to become 3 lanes too, and the junction with the A31 Hog’s Back significant altered / improved.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/404  **Respondent:** 15180193 / Paul Bedworth  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

9.) I object to the lack of consideration of infrastructure improvement. It does not make any sense to have a plan that effectively merges all villages along the A3 from Wisley to Blackwell Farm. In order to make it sound, very significant infrastructure improvements would need to be made, including, but not restricted to, completely rebuilding the A3/M25 intersection to make it freer flowing and an additional lane to be added to the M25 in either direction. The A3 through Guildford would need to become 3 lanes too, and the junction with the A31 Hog’s Back significant altered / improved.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
4.) I object to the provision of sound evidence. The reduction in ELNA of 80% since the 2013 survey means that the need for industrial space at Burntcommon is no longer present.

7.) I object to the situation being labelled as “exceptional”. There is nothing exceptional about the current situation, and if anything, the Brexit vote should put all development on hold until its impact can be fully assessed. The demand for housing may fall if there is a resulting reversal in immigration trends, and foreign student choosing to come to the UK, for example.

8.) I further object (following on) to the plans being based on insufficient evidence of future housing needs. Again, with reference to the huge potential of the Brexit decision.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/534  
**Respondent:** 15180193 / Paul Bedworth  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

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10.) Finally please explain why the inclusion of 2,000 homes at Wisley is still in the plan despite earlier rejection by the GBC on the grounds that they are unsuitable. This gives me no confidence that a logical and valid process is being followed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1191  
**Respondent:** 15180193 / Paul Bedworth  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

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5.) I object to the villages of Send, Ripley and Clandon being removed from the Green Belt. Send provides a buffer between Guildford and Woking. None of these villages should be “inset”. The better use of Brownfield sites must be fully explored and exploited.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
6.) I object to the disproportionate amount of development in one part of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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The changes in the latest plan are significant and therefore require full consultation under Regulation 18, NOT the Reg 19 currently being used and I understand that this invalidates the whole process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the proposal on the basis that it is not sound. It does not make sense to have a plan that effectively merges all villages along the A3 from Wisley to Blackwell Farm. In order to make it sound, very significant infrastructure improvements would need to be made, including, but not restricted to, completely rebuilding the A3/M25 intersection to make it more free flowing and an additional lane to be added to the M25 in either direction. The A3 through Guildford would need to become 3 lane, and, the intersection with the Hogs Back A31 significantly improved.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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GBC Local Area Plan

I have tried to use the only process but it is too difficult to navigate and I have therefore set out my further objections in this correspondence:-

1. I object to the process. The correct process has not been followed: Regulation 18 should have been followed bearing in mind the significant changes that have been made to the plans, more widely, and specifically at Burntcommon, (Garlick’s Arch policy A43), and at land west of Winds Ridge and Send Hill (A44). My understanding is that this invalidates the whole process.

2. I object to the limited consultation period. The impact of the proposal on the locality is so high that further consultation is necessary.

3. I object to only 2 weeks’ notice being given for the inclusion of new sites in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Policy A42

a. A 33% increase in the number of homes when there were so many objections to the original 45 makes no sense whatsoever. The process is illogical and appears to be designed to bulldoze plans through which is undemocratic.

b. It will worsen access and traffic problems at the junction of Tannery Lane and A247 junction. Vehicular access to Tannery Lane is extremely limited.

c. It will worsen water flooding which is already bad.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1650  Respondent: 15180193 / Paul Bedworth  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43

a. Once again, the process is illogical. Thousands of previous objections have been ignored. This makes no sense.

b. It will join up the villages of Ripley and Send, and defy the whole purpose of the greenbelt.

c. The local road infrastructure in Send and Ripley is not able to handle the resulting increase in traffic volumes.

d. This ancient woodland has been there for many hundreds of years. It fails “exceptional circumstances” criteria for developing the greenbelt.

e. Demand for housing figures have decreased since the last plan, yet despite this, the houses allocated to Send has gone up. Again this makes no sense.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1652  Respondent: 15180193 / Paul Bedworth  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy A58

a. It was deleted from the 2014 draft due to the number of objections made: why is it back? Another example of a process that does not follow – logically or make sense for democracy.

b. Where is the proven demand for warehousing? If it is there, why are other local units lying empty, for example in Slyfield? I understand that the 2017 Employment Land Need Assessment concludes that there is a REDUCTIUON in demand in industrial land for the borough (3.9 hectares) so why is a proposal to increase by 10 hectares at Burntcommon even being considered? Once again the process seems completely illogical, not “joined up” or at worse, broken.

c. Why would you sacrifice green belt when there is brown field sites available?

d. It will create gridlock on the surrounding roads.

e. It will destroy the character of the local area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPA16/346   Respondent:  15180833 / Mark Humphriss   Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford and should be retained.
- I object to the building on the Green Belt at Send Hill because it is not justified and the Green Belt is meant to be permanent and not continually eroded.
- I object to all proposals to build on the Green Belt at Send because all the development that is really needed can be accommodated in easily in Guildford’s urban Brownfield areas which are much closer to existing transport hubs.
- I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. This is a significant addition to the plan and has not been properly consulted on.
- I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt.
- The subsoil of the existing site contains documented unsafe land fill waste which is currently vented.
- The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.
- I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.
- I object to the proposal in the local plan on the grounds that the site is not large enough for the proposed use.
- I object to the proposal in the local plan on the grounds that it would cause adverse impact on street parking.
- I object to the proposal in the local plan on the grounds that Send Hill is a single track country road and too narrow to provide sufficient access to the site or accommodate the potential new levels of traffic the proposed development would bring.
• I object to the proposal in the local plan on the grounds that Send is in green belt. The proposed inset is inappropriate due to its permanent green belt status.

• I object to the proposal in the local plan on the grounds that Send Hill is a narrow road result in loss of a turning point for vehicles.

• I object to the proposal in the local plan on the grounds that it would impact the nature reserve nearby. The proposed site is a quality green belt amenity area within countryside and would be spoilt by development.

• I object to the proposal in the local plan on the grounds that the existing road and parking infrastructure is already inadequate or under pressure and could worsen with the planned development, reducing quality of life.

• I object to the proposal in the local plan on the grounds that too many houses are proposed to Send/ Send Marsh are and the impact on traffic congestion and local services would be unacceptable.

• I object to the proposal in the local plan on the grounds that the proposed number of houses potentially could result in 92 extra cars in Send Hill which is already suffering from congestion particularly at school run time.

• I object to the proposal in the local plan on the grounds that the proposed number of houses is disproportionate to the allocated area.

• I object to the proposal in the local plan on the grounds that this would cause loss of village identity, be detrimental to the community and increased flood risk.

• I object to the proposal in the local plan to provide 2 travellers pitches on the grounds that the proposal is contrary to Planning Policy for Traveller Sites (PPTS). In that the proportion of pitches per houses being built is disproportionate. The policy states that the proportion of traveller’s pitches should not exceed 2 per 500 homes. The proposal exceeds those recommendations.

• I object to the proposal in the local plan to provide 2 travellers pitches on the grounds that this proposal has not been previously consulted on.

• I object to the proposal in the local plan on the grounds that a Wasteland Solutions environmental report on Send Hill dated March 2004 gave evidence of past ponding of water in the excavated area. Further development would disturb water table and increase risk of flooding to my property.

• I object to the proposal in the local plan on the grounds that the proposed development site (A44) was used as GBC registered landfill site, not a quarry as listed as reference LLA 2081 in the local plan.

• I object to the proposal in the local plan on the grounds that the 1963-8 Ordnance Survey maps of proposed site mark it as “refuse and slag heap”. It is therefore unsuitable for such a development on health reasons.

• I object to the proposal in the local plan on the grounds that the 1971 Ordnance Survey maps of proposed site mark it as “refuse tip” prior to when proper licensing/registration was required. The date of the landfill works predates the 1999 EU Landfill Directive regulations. I therefore believe that there is a danger that any disturbance would be health hazard due to the unknown materials.

• GBC has installed gas monitoring wells on site since July 2000. One well recording methane gas discharge.

• I object to the proposal in the local plan on the grounds that a Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005-Identifies the proposed site as GBC recorded landfill site Ref GU/11/ LLC with type of waste not identified. The date of the landfill works predates the 1999 EU Landfill Directive regulations. I therefore believe that there is a danger that any disturbance would be health hazard due to the unknown materials.

• I object to the proposal in the local plan on the grounds that a Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005-Identifies proposed site GBC recorded landfill site Ref GU/12 with type of waste identified as “unrestricted”. This causes me concern as to what it does contain and dangers if disturbed.

• I object to the proposal in the local plan on the grounds that both the Envirosearch Report RS1100201_1_1 dated 17th February 2004 and historical map data and information from GBC has identified site as landfill and has “areas of potentially contaminative industrial activities”. Development of this site would be a health hazard. The recent news reports of a child dying from seepage of contaminated ground following flooding prove that developing any such sites is a danger to health. The Daily Mail has also recently had an article on how the dangers of living near landfill site raises cancer concerns. The paper referenced a study published by the International Journey of Epidemiology which tracked 242,000 people living near landfill sites in Italy.

• I object to the proposal in the local plan on the grounds that both the Envirosearch Report RS1100201_1_1 dated 17th February 2004 identifies “potential risk from landfill gas migrations” which I believe is a health hazard.

• I object to the proposal in the local plan on the grounds that both Envirosearch Report RS1100201_1_1 dated 17th February 2004 concludes “potentially contaminative industrial sites identified from analysis” of Ordnance survey maps.

• I object to the proposal in the local plan on the grounds that the Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005-Identifies proposed site as a local authorised landfill site as licences
under Part II of Environmental protection Act 1990. The proposed site is not a quarry as specified in the GBC Local Plan. And is therefore not suitable for the proposed usage.

- I object to the proposal in the local plan on the grounds that the Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005-Identifies proposed site as potentially contaminative industrial land. With usage of “Heap and unknown constituents”. This causes me concern as to what it does contain and dangers if disturbed
- I object to the proposal in the local plan on the grounds that the Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005 Identifies changes to proposed site could cause potential ground water vulnerability to my property.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/426  Respondent: 15180833 / Mark Humphriss  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- General Comments: I do not believe that the proposal for this site is sound in that it is not justified and that alternative sites have not been considered.
  - I object to the proposal in the local plan on the grounds that the site is not large enough for the proposed use.
  - I object to the proposal in the local plan on the grounds that it would cause adverse impact on street parking.
  - I object to the proposal in the local plan on the grounds that Send Hill is a single track country road and too narrow to provide sufficient access to the site or accommodate the potential new levels of traffic the proposed development would bring.
  - I object to the proposal in the local plan on the grounds that Send is in green belt. The proposed inset is inappropriate due to its permanent green belt status.
  - I object to the proposal in the local plan on the grounds that Send Hill is a narrow road result in loss of a turning point for vehicles.
  - I object to the proposal in the local plan on the grounds that it would impact the nature reserve nearby. The proposed site is a quality green belt amenity area within countryside and would be spoilt by development.
  - I object to the proposal in the local plan on the grounds that the existing road and parking infrastructure is already inadequate or under pressure and could worsen with the planned development, reducing quality of life.
  - I object to the proposal in the local plan on the grounds that too many houses are proposed to Send/ Send Marsh are and the impact on traffic congestion and local services would be unacceptable.
  - I object to the proposal in the local plan on the grounds that the proposed number of houses potentially could result in 92 extra cars in Send Hill which is already suffering from congestion particularly at school run time.
  - I object to the proposal in the local plan on the grounds that the proposed number of houses is disproportionate to the allocated area.
  - I object to the proposal in the local plan on the grounds that this would cause loss of village identity, be detrimental to the community and increased flood risk.
I object to the proposal in the local plan to provide 2 travellers pitches on the grounds that the proposal is contrary to Planning Policy for Traveller Sites (PPTS). In that the proportion of pitches per houses being built is disproportionate. The policy states that the proportion of traveller’s pitches should not exceed 2 per 500 homes. The proposal exceeds those recommendations.

I object to the proposal in the local plan to provide 2 travellers pitches on the grounds that this proposal has not been previously consulted on.

I object to the proposal in the local plan on the grounds that a Wasteland Solutions environmental report on Send Hill dated March 2004 gave evidence of past ponding of water in the excavated area. Further development would disturb water table and increase risk of flooding to my property.

I object to the proposal in the local plan on the grounds that the proposed development site (A44) was used as GBC registered landfill site, not a quarry as listed as reference LLA 2081 in the local plan.

I object to the proposal in the local plan on the grounds that the 1963-8 Ordnance Survey maps of proposed site mark it as “refuse and slag heap”. It is therefore unsuitable for such a development on health reasons.

I object to the proposal in the local plan on the grounds that the 1971 Ordnance Survey maps of proposed site mark it as “refuse tip” prior to when proper licensing/registration was required. The date of the landfill works predates the 1999 EU Landfill Directive regulations. I therefore believe that there is a danger that any disturbance would be health hazard due to the unknown materials.

GBC has installed gas monitoring wells on site since July 2000. One well recording methane gas discharge.

I object to the proposal in the local plan on the grounds that a Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005-Identifies the proposed site as GBC recorded landfill site Ref GU/11/LLC with type of waste not identified. The date of the landfill works predates the 1999 EU Landfill Directive regulations. I therefore believe that there is a danger that any disturbance would be health hazard due to the unknown materials.

I object to the proposal in the local plan on the grounds that a Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005-Identifies proposed site GBC recorded landfill site Ref GU/12 with type of waste identified as “unrestricted”. This causes me concern as to what it does contain and dangers if disturbed.

I object to the proposal in the local plan on the grounds that both the Envirosearch Report RS1100201_1_1 dated 17th February 2004 and historical map data and information from GBC has identified site as landfill and has “areas of potentially contaminative industrial activities”. Development of this site would be a health hazard. The recent news reports of a child dying from seepage of contaminated ground following flooding prove that developing any such sites is a danger to health. The Daily Mail has also recently had an article on how the dangers of living near landfill site raises cancer concerns. The paper referenced a study published by the International Journey of Epidemiology which tracked 242,000 people living near landfill sites in Italy.

I object to the proposal in the local plan on the grounds that both the Envirosearch Report RS1100201_1_1 dated 17th February 2004 identifies “potential risk from landfill gas migrations” which I believe is a health hazard.

I object to the proposal in the local plan on the grounds that both Envirosearch Report RS1100201_1_1 dated 17th February 2004 concludes “potentially contaminative industrial sites identified from analysis” of Ordnance survey maps.

I object to the proposal in the local plan on the grounds that the Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005-Identifies proposed site as a local authorised landfill site as licences under Part II of Environmental protection Act 1990. The proposed site is not a quarry as specified in the GBC Local Plan. And is therefore not suitable for the proposed usage.

I object to the proposal in the local plan on the grounds that the Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005-Identifies proposed site as potentially contaminative industrial land. With usage of “Heap and unknown constituents”. This causes me concern as to what it does contain and dangers if disturbed.

I object to the proposal in the local plan on the grounds that the Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005 Identifies changes to proposed site could cause potential ground water vulnerability to my property.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6554  Respondent: 15180833 / Mark Humphriss  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to the local plan site with specific reference to the above policy for the following reasons:

I object to policy A44 in Send Hill on the basis that: There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

I object to policy A44 in Send Hill on the basis that: The proposed development is not sustainable because of poor infrastructure. Send Hill is a single track country road and too narrow to provide sufficient access to the site for travellers or accommodate the potential new levels of traffic the proposed development would bring.

I object to policy A44 in Send Hill on the basis that: A Wasteland Solutions environmental report on Send Hill dated March 2004 gave evidence of past ponding of water in the excavated area. Further development would disturb the water table and increase risk of flooding to surrounding properties.

I object to policy A44 in Send Hill on the basis that: The site was used as a GBC registered landfill site and shown on the 1963-8 Ordnance Survey maps as “refuse and slag heap”. It is therefore unsuitable for such a development on health reasons.

I object to policy A44 in Send Hill on the basis that: On the 1971 Ordnance Survey the site is shown as a “refuse tip” prior to when proper licensing/registration was required. The date of the landfill works predates the 1999 EU Landfill Directive regulations. I therefore believe that there is a danger that any disturbance would be health hazard due to the unknown materials.

I object to policy A44 in Send Hill on the basis that: GBC has installed gas monitoring wells on site since July 2000. One well has documented recording of methane gas discharge.

I object to policy A44 in Send Hill on the basis that: A Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005- Identifies the proposed site as GBC recorded landfill site Ref GU/11/LLC with type of waste not identified. The date of the landfill works predates the 1999 EU Landfill Directive regulations. I therefore believe that there is a danger that any disturbance would be health hazard due to the unknown materials.

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I object to policy A44 in Send Hill on the basis that: An Envirosearch Report RS1100201_1_1 dated 17th February 2004 and historical map data and information from GBC has identified the site as landfill and has "areas of potentially
contaminative industrial activities” and “potential risk from landfill gas migrations”. Development of this site would be a health hazard.

I object to policy A44 in Send Hill on the basis that: The site is unsuitable for a traveller site as it is away from the Village centre and approximately one mile from the shops and the nearest bus stops.

I object to policy A44 in Send Hill on the basis that: The road Send Hill at the entrance to this site is 2.3 metres wide, very narrow and additionally unsuitable for long vehicles and on the opposite side of this narrow road is the multi-denominational Send Cemetery.

I object to policy A44 in Send Hill on the basis that: Existing road and parking infrastructure is already inadequate or under pressure and would worsen with the planned development, reducing quality of life.

I object to policy A44 in Send Hill on the basis that: Existing health infrastructure is already inadequate or under pressure and would worsen with the planned development.

I object to policy A44 in Send Hill on the basis that: This area has been extensively used for sand and gravel extraction and has since been filled with refuse and is therefore unlikely to be suitable for building. The lane is designated SSSI and monitored by The Surrey Wildlife Trust. The roads serving this area are extremely narrow lanes without footpaths and people attempting to walk from here to the Send village shops would be at risk.

I object to policy A44 in Send Hill on the basis that: The drainage and sewerage systems in this area of the village of Send are ancient and frequently cause problems as documented by Thames Water Plc. More housing and road users being added would simply increase the problems further.

I object to policy A44 in Send Hill on the basis that: All proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban Brownfield areas much closer to existing transport hubs.

I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.

I object to building 40 houses at Send Hill because of inadequate access and traffic volume. Send Hill is far too narrow to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road.

I object to policy A44 in Send Hill on the basis that: The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

I object to policy A44 in Send Hill on the basis that: The government’s most recent policy for traveller sites was published in August 2015 and sets out the best approaches for planning for traveller sites. Since the Borough’s current Traveller Accommodation Assessment was published significantly before the 2015 guidance, it should be considered out of date. The dated nature of the 2012 assessment is recognised in the June 2016 Sustainability Appraisal, which states on page 94 that the Council have decided to over-allocate traveller sites in light of the dated evidence base.

I object to policy A44 in Send Hill on the basis that: This site is allocated for 40 homes and 2 traveller pitches. Send Hill is a very narrow road; two cars have difficulty passing one another in places. An additional 40 homes would significantly increase the chances of two cars meeting, resulting in congestion and access issues with little scope to widen the road.

I object to policy A44 in Send Hill on the basis that: Send Hill does not have any pavements for the majority of its length and would be difficult to walk along, especially for those with push chairs or mobility problems.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I believe that the proposal is not sound because it does not comply with Local Policy H1 in that it has allocated Gypsy, Traveller or Traveling Show-people accommodation disproportionality to the size of the site

I object to policy A44 in Send Hill on the basis that: The proposed development is not sustainable because of poor infrastructure. Send Hill is a single track country road and too narrow to provide sufficient access to the site for travellers or accommodate the potential new levels of traffic the proposed development would bring.

I object to policy A44 in Send Hill on the basis that: The road Send Hill at the entrance to this site and the approach from Potters Lane is very narrow. Any alternation to improve visibility as acknowledged in the revised GBC Local Plan is not practical due physical limitations at the junction of Send Hill and Potter Lane. Without this alternation the approach road is unsuitable for the increased traffic including long vehicles that will result from developing this site.

I object to policy A44 as building further houses at Send Hill would exasaspatate the problem of inadequate access due to increased traffic volume. Send Hill is far too narrow to take any more traffic. The junction with Potters Lane is already very hazardous for vehicles emerging into Potters Lane. Any alternation to improve visibility as acknowledged in the GBC Local Plan is not practical due physical limitations at the junction of Send Hill and Potter Lane.

I object to policy A44 in Send Hill on the basis that: On the 1971 Ordnance Survey the site is shown as a “refuse tip” prior to when proper licensing/registration was required. The date of the landfill works predates the 1999 EU Landfill Directive regulations. It is acknowledged in the revised GBC Local Plan that contamination is a concern. It must therefore be recognised that there is a danger that any disturbance would be health hazard due to the unknown materials to both existing and future residents of the site.

I object to policy A44 as it is in direct conflict to Local Plan policy H1. This policy states that “Gypsy, Traveller or Traveling Show-people accommodation should be provided on development sites of 500 homes or more whilst there remain an identified need”. Site A44 has only be allocated 40 houses and so has therefore been disproportionately allocated 2 pitches.

I object to policy A44 as it is in direct conflict to Local Plan policy H1. This policy states that “Gypsy, Traveller or Traveling Show-people accommodation should be provided on development sites of 500 homes or more whilst there remain an identified need”. The GBC Traveller Accommodation Assessment does not justify an identified need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I fully agree with Policy E7. Particularly the need to open up the river front and to improve access for cyclists and pedestrians across the town centre while reducing congestion

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID:</th>
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<th>Respondent:</th>
<th>15180929 / Torkil Fredborg</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ()

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy 4.2.26 should be amended to require planning permission for any conversion of a house into a HMO. The current limit of 6 is not sufficient as there are many examples in Guildford's Victorian streets of HMOs being occupied by more people than they are built for. In order to fulfill the stated intention of monitoring and controlling the distribution of HMOs in the borough, the planning office should require seeing all such projects for approval. Guildford has a large stock of old Victorian properties which are already prone to conversion into HMOs. Evidence from this development during the last 20-30 years show that the converted properties often are not maintained by the landlord and thus - apart from causing undesirable changes in the local communities - it also leads to derelict homes out of character with the remaining characterful Victorian family homes. In addition, the conversion of family homes into HMOs Will naturally mostly occur in the town centre, where it puts undue pressure on the councils stated need to find new family homes. It would seem much more sensible and efficient to discourage conversion of existing family homes and thus enable new developments to focus on smaller units which are easier to fit into the townscape.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (Yes), is Legally Compliant? (Yes)

Answer (if comment is on questions 1-7 of the questionnaire): ()

I fully agree that the historic development in the green belt need to be recognised and that while maintaining the intent of the green belt, already developed areas and urban areas can be excluded in order to enable growth in development. New development can and should be planned in such a way as to not hinder access to the open country site, but the villages now designated as inset areas must be open for new development in order to take the pressure off Guildford Town Centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document: complies with the Duty to Cooperate? (Yes), is Sound? (No), is Legally Compliant? (Yes)

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is understood that the main expansion of new homes should be in vicinity to the Guildford urban area whilst the surrounding villages take their fair share of new homes which may be relatively smaller. However when it comes to the town centre itself, I do not believe there is capacity to expand the number of homes to the extent planned. Guildford town centre already has an overweight of smaller homes and the only way such new expansion could be feasibly done is to provide more single occupancy homes rather than the family homes the borough needs. In addition, with traffic already very congested, it does not appear sound to expand the number of homes so dramatically in the town centre but again, the surrounding areas would better cope with the demand.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

No. I object as GBC have not followed due process as increasing the number of homes to 485, from 185 in Apr 16 requires full consultation under Rule 18, not the shortcut GBC have taken under Regulation 19.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object because GBC has failed to provide sound evidence in terms of Employment Land Needs which shows an 80% reduction in employment space from the previous ELNA carried out. 50% of new houses could be built on brownfield sites instead of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the plan overall as I do not believe GBC have followed due process for this number of homes and there is not enough investment in the surrounding infrastructure to support the additional 485 homes. A new road system is not enough... shops, schools & other amenities such as the Doctor's surgery will all be over subscribed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

 Attached documents:

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I object to the plan overall as I do not believe GBC have followed due process for this number of homes and there is not enough investment in the surrounding infrastructure to support the additional 485 homes. A new road system is not enough... shops, schools & other amenities such as the Doctor's surgery will all be over subscribed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

 Attached documents:
I am writing to strongly object to the above Policies/Planning Proposals.

Guildford Borough Council have been proposing various developments for housing and gypsy sites in Send for a number of years, and despite continued local rejection of these plans continue to try and impose them on us.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Respondent: 15183393 / D Greenman</th>
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We are also concerned with the proposed addition of two travellers sites within the village.

I request the Planning Inspector to reject all the planning proposals for Send as the whole village strongly objects to any further development.

Get the message, we do not want any more development in our village, we will not accept any more development in our village and will fight any attempt to build in any area of Send with all means at our disposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<table>
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<th>Comment ID: PSLPP16/940</th>
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</table>

This will ruin the rural environment of Send. The current infrastructure of Send cannot cope now with the existing population, any increase will have serious adverse effects upon the community.

The proposal of a new 4 way interchange onto the A3 at Burnt Common is ridiculous. part from ruining the environment I green belt the extra traffic and in particular pollution will have a huge impact on Send.

All traffic from the M25 wishing to travel to Woking will be routed through Send, this cannot and will not be accepted.
Send is a small village and our main road A247 cannot cope now. There will be total grid lock! As a resident of over 40 years I have seen Send deteriorate, Potters Lane has become a nightmare early in the morning and evening with the lane being used as a "Rat Run" for commuters to and from Woking/Guildford, its time that the A3 end of Potters Lane was closed and the Woodhill link to the old A3 made exit only.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/939</th>
<th>Respondent: 15183393 / D Greenman</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Once again Guildford Borough Council are ignoring green belt regulations for Send.

The Conservative Party at the last election promised voters to protect Green Belt land. The current Government and GBC are not fulfilling their promises.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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The proposal for 430 houses in 2014 was reduced in April 2016 to 185. Now GBC have increased the number of houses once again to 485 plus an industrial site and gipsy encampment. These changes require full consultation under Regulation 18. GBC are now trying to short cut the consultation via Regulation 19. This action completely invalidates any consultation with residents of Send.

Any new homes should be built on brown field sites outside of the village, not on green belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
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Answer (if comment is on questions 1-7 of the questionnaire): ()

Clockbarn Nursery, Tannery Lane, Policy A42
I object to Policy A42 as the number of homes planned has been increased from 45 to 60 homes. This is an increase of 33% and ignores all previous objections from the residents of Send. Tannery Lane is a single track narrow lane which already has traffic and access problems, to add potentially another 120 cars to this road will only increase the chance of road rage and the possibility of a nasty incident. The Policy will erode more Green Belt. As Guildford Borough Council is a Conservative Constituency who promised not to build on Green Belt - this is totally unacceptable, remember it is the Send residents who helped put you into power and can easily remove you. There is continual flooding in this area and building homes on this land will add to run off and cause additional flooding and distress to householders. The countryside around Send and the rural feel of the area will be lost, this is part of the attraction of Send, residents will not allow this to be ruined.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Garlick's Arch, Send Marsh, Policy A43
I strongly object to Policy A43 change at Garlick's Arch as it ignores all previous objections of the local people. There is no proven need for plots for "Travelling Showpeople" in this area. [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature] This is not wanted in Send or Ripley, Policy 43 should be abandoned forthwith. This area is a permanent Green Belt site and there are absolutely no "exceptional circumstances" for this Policy. The Policy Plan will cause over development of Send and Ripley the number of homes is excessive. Once again 400 homes will amount to another six to eight hundred cars on the local roads. The local roads are already at grid lock at peak periods, as stated earlier the chance of road rage and the possibility of a nasty incident will increase. The ancient woodland of this area has existed since the 15th Century and the reign of Elizabeth 1, what gives you the right to destroy it?? The area is has a flood zone 2 allocation, is this to be ignored as well as the Conservative promise of not building on Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Land at Burnt Common, London Road, Policy A58
I object to Policy A58 at Burnt Common. This plan was deleted from the 2014 draft due to the volume of objections, why has it been reinstated ??? The word “minimum” has been changed from the previous “maximum” in the 2016 plan. Since then there has been a decline in demand for industrial land. There is no need to build industrial or warehousing on Green Belt. This should be built on Brown field sites, not in a rural setting. Slyfield and the surrounding industrial estates still have empty industrial units so why build more. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole of the Borough so again why build 10 hectares at Send on Green Belt.

What incentives are being given to GBC / Councillors to push this through ??? The increase of traffic from this Policy Plan will cause major traffic congestion in an area which is already suffering.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/625  Respondent: 15183393 / D Greenman  Agent:

Green Belt - Policy 2 at para2raph 4.3.15
The proposal that Send Business Park be taken out of the Green Belt goes against everything that has been refused for this site in the past. It would be far better to allow the existing building to be converted into luxury apartments, that would easily sell in this area of outstanding natural beauty adjacent to the Wey Navigation. It would eliminate the need for heavy lorries to use Tannery Lane that has restricted vehicular access. There is no need for development of the old Tannery building, it is hardly a Business Park and should not be used for industrial purposes. The addition of 460 homes in the village with potential to increase the population by 1,150 (assuming 2 people per house and 50% with one child) will put unbelievable pressure on local services, especially doctor's surgeries, schools and the police let alone local hospitals. These plans, policies and proposals are going to ruin the life of the residents, who decided to live in Send and Ripley for its rural areas and quiet way of life. This is now being threatened and the people of Send and Ripley will not stand for it..............

Stop this NOW - ENOUGH IS ENOUGH!!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the strategic Housing Market SHMA figure of 693 houses per annum in the borough [text unreadable].

I trust that the objections made above are fully taken into consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the loss of rural employment (Policy E5).

Garlick Arch would result in the loss of four successful rural [text unreadable].

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

The A3, M25 and roads through the villages Ripley, Send and Clandon already suffer from congestion. Further vehicle movement will result in more acute congestion and [text unreadable] pollution.

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Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the congestion that development will cause to the local villages, roads and the lack of road infrastructure (Policy L1). Our villages are already suffering from severe congestion for much of the day, for example the junction in the centre of Ripley. Many of the country lanes around the villages of Ripley, Send and Clandon are narrow.

With no proper pedestrian footpaths and no proper cycle lanes on the narrow roads, development will result in the road becoming ever more dangerous.

I object due to the congestion that developments will cause to the roads A3/M25 and the air quality. Environmental impact on amenity and health to the local residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposals to remove the villages Ripley, Send and Clandon from the Green Belt. Together with sites of Wisley (A35) and Garlick's Arch (A43). National planning policy requires there to be an exceptional circumstances for the Green Belt boundaries to be altered. There are no exceptional circumstances for the villages and the land to be taken from the Green Belt.

I object to development in areas which are at risk of flooding (Policy P4).

The site at Garlick's Arch is identified on the Environment agency map on [text unreadable] a flood zone 3. Knowing the area well I know that this site often floods.
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Objection to Guildford Borough Council Proposed submission Local Plan June 2016.

I object to the Local Plan as the development proposed will not be sustainable.

The development of 1,300 homes during the [text unreadable] period. It will have a permanently detrimental impact on existing local communities by over development, particularly villages between Guildford and the M25, including Ripley, Send and Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to the Borough [text unreadable] Strategy (Policy S2).

It is clear that it is not a [text unreadable] with disproportionate development in the north east of the borough resulting from the allocation Wisley airfield (A35) Garlick Arch on Ripley and Send border (A43) and Gosden Hill (A25) as major residential sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SCNI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
homes at the Thatcher’s Hotel site, so potentially 100 new cars entering this dangerous part of the Epsom Road, I would be very worried. There should be larger lanes, and perhaps some traffic calming measures for those travelling 60 mph on it.

And the local schools? Will they be expanded and given more funding for the increase in children expected to move in the new homes? The Howard of Effingham is no longer as strong as it used to be - larger class sizes, a reputation (and indeed children of friends) for drugs around, and small roads surrounding it are a concern.

Shopping - we have a horrible Budgens in East Horsley which is not suitable for the area - where are they all going to shop? The road to Cobham is again filled with residents, speed watch concerns and a 2 lane dangerous drive.

Parking at the train station - is almost at capacity with the current number of residents. the new ticket machine on the platform is GREATLY appreciated, but parking will need to be looked at if more residents will be using it.

I don’t mind growing, but I feel that the investment in the roads, schools and resources need to match the number of residents - and it doesn’t at the moment. I would be very concerned for road safety and for the childrens’ education if there were any more residents. I hope investment in the areas is completed before new homes can be built in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/429  Respondent: 15184609 / Amanda Leiper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

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2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.

3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

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6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

6. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

7. I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

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I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

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Answer (if comment is on questions 1-7 of the questionnaire): ()

I write with reference to the above submission plan.

I would be grateful if you could kindly confirm that all of these comments together with all my previous comments will be passed to the Inspector. I reserve my right to appear at the inquiry.

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.

It is further from railway stations than any other identified strategic site.

It is adjacent to the most congested stretch of strategic road network in the county and close to the most congested junction in the country (J10).

Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)

Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe, putting my family and others in danger.

It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum. RHS Wisley traffic already cause frequent congestion by traffic on local roads – there is already vulnerability and this will get worse.

1. The associated traffic increase from the RHS has not been taken into account.
2. The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account

There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis – again, more danger and potential fatalities.

The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station

It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.

I object to the increased area of the site as this now abuts additional heritage assets, including Upton Farm and Bridge End House negatively impacting the setting of these buildings and the wider Ockham Conservation Area.

I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB and destroy the far reaching countyside views for future generations. Surely there is a responsibility to maintain this?

I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)

I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objections from local residents and statutory consultees – Why bother to consult if you then ignore the overwhelming popular view?.

I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

I object to the extension of the plan period by 1 year as it has not been identified as a major change

I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.
I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as
green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal
challenge.

I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage
caused by nitrogen deposition and high pollution levels.

I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the
figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring
examples of why the plan is not sound.

It is my belief bearing in mind the reasons listed above from a not exhaustive list that this plan is unsound and not fit for
purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/956  Respondent: 15184833 / Mark Coomber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We are writing to confirm that we object to the proposed changes to move the green belt boundary to exclude the fields
behind the Shalford Village Hall and to extend the village settlement boundary to include these fields.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/329  Respondent: 15184993 / Muriel Millar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Surrey wants to preserve as much of the Green Belt as possible. The nearer to London, the greater the pressures and the more important it is to resist them.

The Plan provides for undue development in Send and neighbouring villages. We are all NIMBYs of course, but there has already been considerable development in Send, recently and at present.

On the grounds of Green Belt, traffic and infrastructure...

I object to policy A42 Clock barn Nursery, Tannery Lane
I object to policy A43 land at Garlick Arch, Burntcommon
I object to policy A44 land West of Winds Ridge

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp173/61  Respondent: 15184993 / Muriel Millar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the increased green belt erosions which are contra-indicated by the Council's official stance.

Contrary to the first four points of the Council's own "significant updates" review (page 03 of About Guildford) and in spite of all the objections to the '16 Plan itself, Send's position has been worsened by the latest changes. Send's green belt status has been completely ignored. We challenge the statement that only 1.5% of greenfield land in the green belt is proposed for use in the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/511  Respondent: 15184993 / Muriel Millar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to policy A43 change because 8 pitches would be [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature].

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/512  **Respondent:** 15184993 / Muriel Millar  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A58 because any industrial use of Burntcommon is unnecessary, let alone the unlimited "minimum 7,000 square m." cited.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/330  **Respondent:** 15185153 / Olivia Stuart  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please note that I object, very strongly, to the following:

- Lack of evidence of the housing need in the borough;
- Removal of villages from the Green Belt allowing increased development into the future;
- The proposed erosion of the Green Belt in any way, shape or form; The really short time frame for consultation of the Draft Local Plan;
- The council ignoring the many suitable brownfield sites within the borough which could be used for future development;
- The lack of proposed new infrastructure and facilities to cope with the needs of those already living in these areas, without increasing the demand by intensifying the housing;
- I object to the lack of immediate provision for new schools, GP surgeries etc. locally;
I object to the potential six main development sites contained in the Draft Local Plan which are located in and around the Horsleys.

It is already hard to get see a doctor, to get a school place, or to travel around the area because of so much traffic, so why make things any worse within our uniquely beautiful villages? The roads are already too dangerous for me to cycle on because there are so many cars, without adding to these by building lots of smaller developments all over the place - why not concentrate on the bigger brownfield sites?

Please ensure that my comments are available for the Independent Inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/960  Respondent: 15185153 / Olivia Stuart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I Object to the 2016 Local Draft Plan

I wish to record my strong objections to the Draft Local Plan which is out for public consultation currently.

I live in West Horsley and I am aged 16. My family moved to this area because we did not wish to live in an urban location (like Guildford itself) - we like the countryside with its open, green spaces. These are special places, with lots of amazing wildlife and interesting species. Areas like these must be protected for future generations.

We have learned at school about the Green Belt which I think should be protected from erosion by possible future disproportionate development - how can you identify new development sites and produce a whole plan without having a solid set of evidence as to what the future housing need actually is? No one has ever asked me whether I wish to buy a house within the villages surrounding Guildford when I am older.

I object to West Horsley, and all the other local villages, being removed from the Green Belt - this is being done just so that you can then allow increased development which is not wanted by local people. There are lots of other areas (like the old Wisley Airfield) which could be developed upon and which have good links to the bigger roads which could and should be used first.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/436  Respondent: 15185185 / Jeff Gill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. How can land be identified as Green Belt ie: protected and then ‘unprotected’ like this – it is a mockery of the whole concept of protection!

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is simply too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars. Commuters going to Effingham station are NOT going to cycle or walk!
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads. These are small lanes which don’t have the capacity to take this sort of traffic.
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
   4. The increase in traffic will create a danger to those who do cycle (and pedestrians walking to the woods with their dogs), due to the absence of any cycling paths and the lack of pedestrian footpaths (as there is no space to provide them).
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity. Where are all these extra commuters going to park? This will lead to further development of common land which is again ‘protected’.

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, which is already in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation. I am asthmatic as is my father.

9) I object to the fact the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I simply fail to see how the local planning committee can be even reconsidering this application with so many people objecting. It certainly appears to me that the opinions of the locals are not being listened to at all. Rumours abound concerning the investment company whose registered office is in the Cayman Islands and one has to wonder given recent exposes concerning companies from that region whether everything is actually as it should be……

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3696  Respondent: 15185185 / Jeff Gill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I believe this is now the third or even fourth time I seem to be writing to object to this planning submission. I am at a lost to understand why this is repeatedly being put forward with such minor changes as to be not worth reconsidering and this is despite being rejected by thousands of local residents. This is being planned at the detriment of the local community.

I object to this submission plan AGAIN due to the poor quality and lack of transparency in the evidence to support this case - and you will note my objections below.

Please confirm that all of these comments together with all my previous comments are passed to the Inspector.

In summary I again object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)
4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   ◦ The associated traffic increase from the RHS has not been taken into account.
   ◦ The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account
8. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station
10. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
11. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”
12. Opportunity (3) should be common to all sites and is not unique to this site
13. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
14. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
15. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
16. I object to the removal of additional 3.1 ha from the green belt without any justification
17. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact
18. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3
19. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
20. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.
21. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
22. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.
23. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.
24. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

25. I object to the extension of the plan period by 1 year as it has not been identified as a major change.

26. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

27. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

28. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

29. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

30. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

31. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

32. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

33. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

34. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

35. I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development. I particularly object to the reliance on the Carter Jonas study update 2017 which includes “demand” for retail space from companies already in administration.

I consider for the reasons listed above, yet again, this plan is unsound and not fit for purpose. I object to this plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars

  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads

  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements

  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)

  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest

  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.
I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/331</th>
<th>Respondent: 15185409 / Sebastian Rudnicki</th>
<th>Agent:</th>
</tr>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley</td>
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</tbody>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ) , is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).

I object on these grounds...

• I object to the Local Plan as the proposed development is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable – it will have a huge negative impact on local communities by over development, especially Ripley, Clandon and Send. The local communities do not need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and extremely inadequate bus services, so almost every adult will have to have a car. The Plan does not benefit the infrastructure for Garlick’s Arch.

The development would be best served in urban areas where there is sustainable transport.

• I object to not protecting the Green Belt (Policy P2) I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

1. I object due to the massive congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1) I am due to purchase and complete on a c.1854 cottage in Newark Lane and extremely concerned by the potential increase in traffic on this tiny narrow lane into Ripley village.

There is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that.

The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses means dangerous and unsustainable traffic.

• I object to development in areas which are at risk of flooding (Policy P4) The Plan does not take adequate account of flood risk as required by National Planning Policy.
The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. The area has flooded frequently in recent years and so the Council’s assessment is not good enough to be included in the plan.

- I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a) North facing ramps to the A3 at Burnt Common would be a disaster for local communities, which do need to access the A3 to the north, but this addition will attract a huge amount of ‘through’ traffic. For example all traffic from London/M25 to Woking would go through Burnt Common, Send and Old Woking. This is not sustainable as this cannot be improved.
- I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43) Garlick’s Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for it’s removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance.

The Plan states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch.

The site is inappropriate because:

1. There is no sustainable transport infrastructure.
2. The site is liable to frequent flooding • The site has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.

- I object to the Borough Wide Strategy (Policy S2) GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there is too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

- I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3) The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irreversibly damage the character of the Ancient woodland on the site, which includes over 80 ancient oak trees.
- I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D) The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

- I object to poor air quality concerns (Policy I3) The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health.
- I object to the proposed Infrastructure Schedule (Appendix C) The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. Therefore it is not fit for purpose.
- I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5) There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

- I object to the lack of proper infrastructure planning for sites (Policy I1) The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which
has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

- I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2) The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

I am very concerned by these proposals, as I am soon to complete on my purchase of a property in Newark Lane, Ripley. I was so looking forward to my move to this idyllic area and whilst I don't wish to reconsider, it is a matter of grave concern.

I wish these objections to be fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to this development due to its compounding impact on road safety, traffic and congestion and the threat to this protected green belt area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/336  Respondent: 15185537 / Peter Mills  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

H. I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick's Arch (A43), so the Plan takes no account of the infrastructure required for this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/335  Respondent: 15185537 / Peter Mills  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

F. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan's proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/439  Respondent: 15185537 / Peter Mills  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

D. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for it’s removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance.

The Plan states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch. The site is not appropriate because there is no sustainable transport infrastructure, there is flooding liability and there are no plans to improve services to cope

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/442  Respondent: 15185537 / Peter Mills  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I. I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

There is an existing brownfield industrial site at Burnt Common that could accommodate the 7,000 sq m proposed. That site was removed from the Plan for no good reason.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/967  Respondent: 15185537 / Peter Mills  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
E. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3). Damage to ancient woodland – oak trees etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPP16/966</th>
<th>Respondent:</th>
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C. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1), as there is too much traffic in our villages already.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
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J. I object to the lack of proper infrastructure planning for sites (Policy I1)

Insufficient infrastructure improvements are planned to support the development. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID:</th>
<th>PSLPP16/970</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
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</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

K. I also object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2).
I politely request that these objections are taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/965</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to not protecting the Green Belt (Policy P2)
I very strongly object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). What are the exceptional circumstances for these villages and sites being removed? I believe National Planning Policy requires this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/963  Respondent: 15185537 / Peter Mills  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016), for the following reasons:

1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)

   The proposal is for too many properties leading to over development, whilst there appears to be nothing to improve the infrastructure & services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLP16/968  Respondent:  15185537 / Peter Mills  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

G. I also object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey. This volume of housing is disproportionately high at 36% of plan’s new housing in an area which currently has 11%.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPS16/441  Respondent:  15185665 / Jan Gerrard  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A40

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings
I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.
Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/977</th>
<th>Respondent: 15185729 / P H Brook</th>
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<td>b) Safety matters. Most of the side roads are narrow and inadequate at times as it is. The pavements and footpaths (away from the High Street) are narrow and in bad repair.</td>
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<td>Many people do still walk (they have to). In many cases there are home at all, or are very narrow.</td>
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<td>And we have often have to share them with cyclists. This is a safety issue.</td>
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<td>All this will be the consequence of the tremendous increase of houses.</td>
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<tr>
<td>I write to state my strong objections to this plan, for the following reasons:</td>
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<tr>
<td>a) the effect on the living environment; that is to say the vast increase in motor traffic which will bring increased congestion, noise, pollution and wear and tear.</td>
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</table>
I am writing to object to the local plan.

Despite the possible need for more houses to be built in this area, I believe that there are many disadvantages of this plan that far outweigh the benefits.

One of the main reasons I, along with many others, object to this plan, is that the increased number of houses will lead to higher levels of congestion. Even though more roads are being built congestion will still rise. This puts the safety of the children at local schools at higher risk. This backs up my argument as to why I object to the local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

A further reason as to why I object is due to the destruction of green belt land. Even if it is in your plans to assign new green belt land, I am sure that in the future this land will also be built on, therefore, it is vitally important to protect the green belt land we have at the moment. I object to the land at Garlick's Arch having 400 houses built on it as it is Green Belt permanently protected by the NPPF which prevents the merging of settlements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Finally I object to the process GBC have taken to try and implement their ideas. The changes made to cut the houses from 185 to 485 have not had another full consultation, which invalidates the process.

Having stated these points, I believe that it is vitally important that the local plan does not take place, and is re-thought out.

Thank-you for taking the time to read this, and I would like this to be passed on to the Inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Firstly, I object to Policy A42 for the change at Clockburn Nursery. The reasons for this statement include:
It will create a third more than the previous amount of homes here. This is an unacceptable increase.
Tannery Lane is narrow and not designed for lots of cars and this increase in homes will cause a lot of traffic issues. It will become more dangerous for people trying to be fit and healthy, lots of people walk and cycle along here and as a nation trying to encourage exercise and fitness in an age of obesity and health related problems this should be considered not only here but in the rest of the surrounding area where roads are already congested and cycling hazardous. Building into the Greenbelt will impact the local countryside- something that distinguishes this area from that of areas nearer to London and in effect our area will become part of outer London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Firstly, I object to Policy A43 for the change at Clockburn Nursery. The reasons for this statement include:
It will create a third more than the previous amount of homes here. This is an unacceptable increase.
Tannery Lane is narrow and not designed for lots of cars and this increase in homes will cause a lot of traffic issues. It will become more dangerous for people trying to be fit and healthy, lots of people walk and cycle along here and as a nation trying to encourage exercise and fitness in an age of obesity and health related problems this should be considered not only here but in the rest of the surrounding area where roads are already congested and cycling hazardous. Building into the Greenbelt will impact the local countryside- something that distinguishes this area from that of areas nearer to London and in effect our area will become part of outer London.
Secondly, I object to policy A43 for the change at Garlicks arch for the following reasons.
One: There is no proven demand for travelling show people plots in this area.
Two: It will join Ripley up with Send, defeating the purpose of greenbelt, loosing any sense of the traditional villages.
Three: It is subject to frequent flooding - this land needs to be there to prevent issues flooding other houses downstream of the river.
Four: It will create excessive traffic. Over the last 20 years the traffic has increased dramatically. If it continues to increase the whole area will become a permanently gridlocked.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3331  Respondent: 15185857 / Matthew Monk  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Thirdly, I object to policy A58 of a minimum of 7,000 sq m of industrial warehousing because of the change from ‘maximum’ in the previous plan to ‘minimum’ in the current plan despite a decline in the demand. This is proven by empty sights in Slyfield and Guildford which should all be filled first. The 2017 Employment Land need assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough so why has Send been earmarked a huge over allocation of 10 hectares at Send in green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1615  Respondent: 15185857 / Matthew Monk  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Fourthly, I object to Policy 2 of the proposal to inset Send Business Park from the greenbelt because it there is limited vehicular access and development of this location detracts from the openness of the Greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/975  Respondent: 15185889 / Alan Leiper  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the draft Local Plan for the following key reasons. I object to the lack of protection for Green Belt, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. I object to disproportionate housing development in our area, over-loading schools, health services and public transport including stations.

I object because of the huge increase in traffic on narrow rural roads, trunk roads & lanes which already suffer severe congestion, to say nothing of the danger this will cause to local cyclists and pedestrians. I object because of the air pollution from thousands of extra cars affecting children & elderly people. I object to the continued inclusion of FWA/TFM where the planning application was unanimously rejected by GBC's Planning Committee. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site in relation to SPA, SSSI & SNCI. I trust that my objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35 is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/978  Respondent: 15186273 / Suzannah Monk  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing to object to the local plan.

Despite the possible need for more houses to be built in this area, I believe that there are many disadvantages of this plan that far outweigh the benefits.

One of the main reasons I, along with many others, object to this plan, is that the increased number of houses will lead to higher levels of congestion. Even though more roads are being built congestion will still rise. This puts the safety of the children at local schools at higher risk. This backs up my argument as to why I object to the local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/979  Respondent: 15186273 / Suzannah Monk  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A further reason as to why I object is due to the destruction of green belt land. Even if it is in your plans to assign new green belt land, I am sure that in the future this land will also be built on, therefore, it is vitally important to protect the green belt land we have at the moment. I object to the land at Garlick's Arch having 400 houses built on it as it is Green Belt permanently protected by the NPPF which prevents the merging of settlements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/280  Respondent: 15186273 / Suzannah Monk  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Finally I object to the process GBC have taken to try and implement their ideas. The changes made to cut the houses from 185 to 485 have not had another full consultation, which invalidates the process.

Having stated these points, I believe that it is vitally important that the local plan does not take place, and is re-thought out.

Thank-you for taking the time to read this, and I would like this to be passed on to the Inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Firstly, I object to Policy A42 for the change at Clockburn Nursery. The reasons for this statement include: It will create a third more than the previous amount of homes here. This is an unacceptable increase and will upset many local people. Tannery Lane is narrow and not designed for lots of cars and this increase in homes will cause a lot of traffic issues and will become more dangerous for people trying to be fit and healthy and cycle- something as a nation we are trying to encourage. Building into the Greenbelt will impact the local countryside- something that distinguishes this area from that of areas nearer to London and in effect our area will become part of outer London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Secondly I object to policy A43 for the change at Garlicks arch for the following reasons. One: There is no proven demand for travelling show people plots in this area. [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]

Two: It will join Ripley up with Send, defeating the purpose of greenbelt, loosing any sense of the traditional villages.

Three- It is subject to frequent flooding- this land needs to be there to prevent issues flooding other houses downstream of the river.

Four- It will create excessive traffic. Over the last 20 years the traffic has increased dramatically. If it continues to increase the whole area will become a permanent traffic jam.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Thirdly, I object to policy A58 of a minimum of 7,000 sq m of industrial warehousing because of the change from ‘maximum’ in the previous plan to ‘minimum’ in the current plan despite a decline in the demand. This is proven by empty sights in Slyfield and Guildford which should all be filled first.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Fourthly, I object to Policy 2 of the proposal to inset Send Business Park from the greenbelt because it there is limited vehicular access and development of this location detracts from the openness of the Greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing with reference to the final draft local plan for the Send and Ripley area and I would like to raise my objections with these quite frankly outrageous propositions.

With reference to the policies P2, A42, A43, A43a and A44 I object for the following reasons.

Policy P2 - Send is a small village community on the edge of Woking and it provides a buffer between the town and the open countryside. To remove Send from the Greenbelt is a short-sighted act of lunacy. Greenbelt is designed to provide protection from urban sprawl and to erode it in this way is irresponsible and indeed there were repeated specific election promises to protect it. We are all custodians of our countryside and it needs protecting from reckless planners for future generations.

I object to the large number of houses proposed in the plan on all of the sites. The increased population will undoubtedly place extra traffic onto roads which already struggle to cope with the current population. The A247 through Send is a small road in a bad state of repair due to traffic loading. During certain periods of the day the traffic queues back for more than a mile and as soon as any maintenance or service works are undertaken the road becomes realistically impassable during peak periods. The village of Old Woking provides a bottle neck for traffic heading toward Woking and Maybury and increasing population in Send and beyond will only exacerbate the situation.

Policy A42 – I object to the building of 45 houses at Clockbarn Nursery. Apart from this area being subject to potential surface water flooding this will just bring more traffic onto the A247 Send Road or feed it through narrow and single track rural roads towards Newark Lane.

Policy A43 - I object to the proposed employment space at Garlick’s Arch for the same reasons as above. The increase in HGV traffic, should this go ahead, will cause more congestion and damage to the roads in and around Send. I also object to the proposed 400 houses. This is a new site that has not previously been consulted upon; it was not included in the Regulation 18 draft. There is no need for these additional houses on top of the thousands already proposed for the borough.

Policy A43a - I object to the proposed A3 junction for reasons of additional traffic congestion, damage to existing roads and reduced air quality and increased pollution.

Policy A44 - I object to the proposed development for housing and travellers pitches in Send Hill for the following reasons.

This is again a newly identified site and was not included in the Regulation 18 draft; it has not previously been consulted on and is therefore inappropriate to include it in this consultation.

Send Hill is a quiet residential road surrounded by countryside. There is insufficient access to the proposed site, it is inappropriate for the proposed purposes and not in keeping with the area. Indeed other private local planning applications have been turned down for this reason. The subsoil of the site contains documented unsafe landfill waste which is currently vented. The road is narrow, single track in places, with no footpaths and as the road is straight it is already used as a rat run for some vehicles to cut through to and from the A3 potters lane junction.

The road is used by the George Abbott school bus and many school children walk along Send Hill to meet the bus at the junction with the A247. Additionally younger children walk with families to attend the primary school currently in Bush Lane at the end of Send Hill. Even when the school moves to its new site the children will still be walking along Send Hill to attend it. Increased housing and the resulting traffic will place these children at added risk. Indeed rather than building more homes Send Hill should be subjected to traffic calming measures to protect the children who walk to school and other residents.

Send Hill is also home to a number of bats who require protection from development and there are native bluebells in the woodland which also need to be protected.
In additional, this is an unsuitable position for travellers pitches, there are a number of elderly residents who are quite frankly terrified of what this area could become. Although it is stated that the areas will be maintained and managed, realistically that will not happen. This will only lead to increased pollution of our countryside, a potential increase in local crime, and it is not a suitable area to place.

To conclude my objection to the plan I would like to mention the local services such as health centres and schools which are already under a huge burden.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )

I am sadly having to write again to you as I don’t think that you have read my last letter. I was under the impression that I lived in a democracy and that the local councillors were elected by the people who live in a borough to serve them. They were in part elected on the basis of promises made to the electorate which as we all know, at least as far as planning is concerned, they have ridden roughshod over or completely ignored.

Tens of thousands of objections have been placed before you last year regarding the local plan and you not listened at all. Even allowing for the fact that further housing is necessary over the coming years it would appear that the area north of Guildford especially Send has been disproportionately targeted. At this point in time I understand that you will only allow objections to the changes you have made in the latest draft. With reference to the policies A42, A43 and A58.

I object to the proposal to inset Send Business Park from the Green Belt. This will allow future sprawling development over which we will have no control. We are all custodians of our countryside and we need to protect it for future generations. To allow this to happen will create the opportunity for future expansion or development at this location without consultation.

The housing demand number in the Local Plan has dropped by 39 houses per annum from 2018 to 2034, and despite this, Send’s contribution has been increased without any justification. Major sites in Send and Ripley have been changed 3 times; first we had Burnt Common, then Garlick’s Arch and now we have both. Guildford Borough Council appear to have a predetermined agenda to build on the Green Belt and without any constraints to take into account the lack of infrastructure such as roads, schools and medical facilities as required by law.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the change in policy which has increased the number of houses to 60 (33% more) from the previously proposed 45 houses at Clockbarn Nursery. This area is subject to surface water flooding which this will exacerbate and will bring even more traffic onto the A247 Send Road. This will either create a bottleneck at the junction of the A247 and Tannery Lane or feed it through narrow and single track rural roads towards Newark Lane.

This policy change will increase the erosion of the Green Belt in our village and will impact upon open countryside views around the precious River Wey navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2535  Respondent: 15186305 / Joe Strudwick  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43 – I see that the proposed employment space at Garlick’s Arch has now been move to Burnt Common under Policy A58 and I will comment on that later. I object to the proposed 8 travelling show people plots on this site in addition to the 400 homes because there is no proven demand for them in this location and the lorries that will go along with these people will cause further congestion and pollution on the local roads.

The Local Plan H1 policy states that “Gypsy, Traveller or Travelling Show people accommodation should be provided on development sites of 500 homes or more whilst there remains an identified need”. Send has been disproportionately allocated 2 traveller pitches as well as all 8 travelling show people plots identified as needed in the borough until 2034. The developments of over 1500 houses at Gosden Hill and Wisley are only allocated 8 pitches apiece during the same period. In addition the proposed location of these sites do not conform with the Guildford Borough Council’s own traveller policy in terms of the identified needs of this ethnicity of people; e.g. distance from schools, shops, transport and the need to join a community of people.

This land is ancient woodland allocated as Green Belt to avoid Ripley and Send being joined up. It is also subject to frequent flooding and has a flood zone 2 allocation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2534  Respondent: 15186305 / Joe Strudwick  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed employment space at Burnt Common (formerly planned for Garlick’s Arch) as the increase in HGV traffic, should this go ahead, will cause more congestion and damage to the roads in and around Send. This was deleted from the 2014 draft due to the number of objections but following the smoke and mirrors move to the Garlick’s Arch site in 2016, it has now appeared back in its original location but with the maximum 7,000 square meterage now as the minimum – absolutely ludicrous. Since the 2016 plan there has been a decline in demand for industrial land and there is no need to create this from Green Belt land when Slyfield still has empty sites and industrial units. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares of industrial land for the whole of the borough yet the language of this policy A58 opens this site, of in excess of 9 hectares, to unlimited development well beyond what is in the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/980  Respondent: 15186657 / Philip Boast  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I'm writing to you with reference to the proposed building of many houses on our GreenBelt land.

I want to strongly object to ALL erosion of our GreenBelt and the building of anything on green field sites. Our county and country are being ravaged by development.

I object to site A43 Garlicks Arch

I object to site A45 The Talbot - it's a conservation area!

I object to site A57

I object to the last minute inclusion of new sites with little notice.

New schools? New medical facilities? Where is the provision for these?

Our GreenBelt is a precious recourse and should not be abused.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<td>Clay Lane Link Road.</td>
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<td>Jacobs Well being removed from the green belt.</td>
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<td>Building more homes and offices on Guildford countryside.</td>
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<tr>
<td>Having been a resident of Burpham for 34 years I am amazed that the local plan is even being considered when all one needs to do is look at the general traffic chaos that occurs most mornings and evenings in and around the Burpham area, added to this the general traffic going to and from the Aldi store only adds to the general gridlock. To add to this already chaotic traffic situation the proposed Gosden Hill development would really be the height of madness in an already overpopulated area of Guildford. Please, please think what you are committing a wonderful part of Surrey to, i.e. constant traffic congestion and added pollution. This area is already at saturation point, do not make it worse</td>
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Proposed change from 2000 to min 1700 homes is still too many homes for Burpam and Merrow to handle. Traffic conditions in the area are at grid lock levels now and I cannot see the proposed changes to road infrastructure will do anything to alleviate the daily traffic chaos in and around Burpham/Merrow. Surely the planners must be able to see the impact that the amount of cars that 1700 homes would produce. Please reconsider the number of homes at Gosden Hill and let common sense prevail.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/985  Respondent: 15186785 / Benjamin Lowe  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objection to Shalford Green Belt / Settlement Boundary (New Version of Guildford Local Plan)
I object

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/986  Respondent: 15186817 / Katie Lowe  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Objection to Shalford Green Belt / Settlement Boundary (New Version of Guildford Local Plan)

I object

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I refer to the draft Local Plan and specifically the part relating to what you call Garlick's Arch, Burnt Common.

This is designated for 400 houses and industrial and warehousing. I object to the proposal. I currently use the land for clay pigeon shooting.

I believe this site is a new proposed site for building and has not been the subject of previous consultation. It is Green Belt and there are no exceptional circumstances allowing for any building on it. There is an area of ancient woodland.

A new 4-way interchange onto the A3 at Burnt Common would be disastrous for Send and would open Send as a through route for traffic leaving the M25 and A3 for Woking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

I am bombarded with flyers asking me to register my objection to the local plan. Whenever I go out I am assailed by posters telling me to object to the local plan. Nowhere do I see any mention of housing problems, particularly those faced by young people. My grandchildren have no hope of getting on to the housing ladder and it is no answer to tell them to move to cheaper parts of the country. They work here, friends and family are here. I feel that the objectors are entirely misconceived and primarily driven by their own narrow interests. Instead of blanket objections they should be wholeheartedly supporting plans to build more houses and putting their energies into ensuring that the main thrust is on
affordable houses with adequate support for the infrastructure, particularly in such areas as schools and medical facilities. For example Send has one medical practice with one full time and four part time doctors and can barely cope with the existing population. I have many friends who share my view. They don't get up and shout at public meetings. It is a sad reflection that one fears that to express publicly views contrary to those of the objectors would result in much unpleasantness that might even verge on physical violence. So the fact that supporters of the plan keep their heads down should not be taken to mean that everyone is opposed to the public plan. I would add that the proposed Garlick's Arch industrial development is obviously more sensible than a similar development at Slyfield. So if there is a need for such a development it should be Garlick's Arch. I would be obliged if these views could be seen by the Planning Inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt.

The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself is too spread out to anticipate a reduced reliance on private cars

1. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads

1. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements

1. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the lack of space to provide for them)

1. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest

1. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I have recently heard about the amendment to the local plan and the impact that this will have on Shalford village, and would like to state my objection.

I believe this amendment will significantly and irreversibly alter Shalford village to the detriment of this area - the character of the village will be completely lost.

The services cannot cope with additional housing. The local roads already suffer from severe congestion at key times of the day.

I believe there is no valid reason to wreck the village of Shalford in this manner.

I object to this proposed development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>PSLPP16/1002</th>
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<th>15188449 / Richard Harriss</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

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<td>Document:</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

[Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] I am writing to object at the proposed changes to the Local Plan by Guildford Borough Council (GBC) to the fields behind the Shalford village hall.

The fields you are planning to develop contribute to the open character of the Shalford village and provide a rural backdrop - I believe that GBC should support the expressed views of over 700 local residents who signed the petition objecting to this development and retain this land within the Green Belt and keep them outside the village settlement boundary.

Due to their height, these fields contribute to the openness of the Green Belt and any development would tower over the village community facilities and surrounding areas - with very large developments already planned both sides of the village is it really worth spoiling the heart of Shalford by building on this virgin, totally undeveloped site?

I have already seen first hand in station road that previous developments haven't taken the impact of more cars on the small road infrastructure in Shalford - both parking on pavements and making roads more busy and dangerous. As there are so many families with young children in the area my main concern is that access to this land is via Chinthurst Lane, which is already heavily congested, and is a key route for families to access walks in Chinthurst Hill and alone the old railway line to Bramley, which will then become more dangerous int he future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1003  Respondent: 15188513 / Michael Brenner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/451  Respondent: 15188641 / Janet Banfield  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is with dismay that I read that Normandy is included in the draft plan for the building of 1100 houses and a secondary school.

Normandy is a small village, of some 1300 houses. This proposal will double the size of a delightful village, bringing with it horrendous traffic problems. Both Glaziers Lane (D60) and Westwood Lane (C16) are narrow, minor roads: one has a one-lane chicane under a railway bridge, the other a blind bend crossing over the railway: dangerous layouts already, but deadly with at least double the increased number of vehicle movements.

**I OBJECT TO THIS PROPOSAL ON THE GROUNDS OF INADEQUATE ROAD INFRASTRUCTURE TO ACCOMMODATE VASTLY INCREASED TRAFFIC MOVEMENTS**

A school designed to accommodate 1500 students can only increase vehicle movements. The argument that students would travel by train is unrealistic. Most students are transported by parents, by car, to all schools for reasons of cost, convenience and time. The logical place to build a school must be on the Blackwell Farm development, with its 1800 houses already planned by the university and I believe, approved. I gather that local schools, Ash Manor and Kings College are not fully subscribed, so it would seem that plans for a new school are a bait to the council by the developer, in exchange for allowing them to build 1100 houses.

**I OBJECT TO THIS DEVELOPMENT IN NORMANDY BECAUSE NO CASE HAS BEEN PUT FORWARD TO JUSTIFY THE NEED FOR MORE SCHOOL PLACES, BUT APPEARS TO BE DEVELOPER LED. ESSENTIALLY, THE COUNCIL IS BEING BRIBED TO ALLOW HOUSE BUILDING WITH THE OFFER OF A NEW SCHOOL.**

This village has already given up 32 acres of land, Manor Fruit Farm, to the detrimental impact on wildlife. Reduced numbers of gold-crests, linnets, owls and the destruction of the nightingale population are the result. 1100 houses and a school will destroy what wildlife remains: the foxes, the deer, the hedgehogs, the Badgers.

**I OBJECT TO THE DEVELOPMENT PROPOSALS BECAUSE THIS VILLAGE HAS ALREADY LOST VALUABLE HABITATS FOR WILDLIFE AND BUILDING ON THIS SCALE WILL DESTROY, TOTALLY OBLITERATE, NATIVE SPECIES.**
No mention has been made of any initiatives planned to deal with flooding which is already an issue within the village. The scale of the development will exacerbate an already intolerable situation.

GBC cannot, or will not provide information regarding the calculation for proposed population growth for Guildford. Surrey University has skewed housing needs within the borough by not building sufficient 'on campus' student accommodation, resulting in several thousand houses being unavailable for the housing market. The university has a moral responsibility to provide accommodation for its students.

GBC has inexplicably REMOVED some development sites included in former draft plans and omitted to INCLUDE other sites OFFERED for development. (Land in Clandon, offered, I believe, by Lord Onslow is not included).

I OBJECT TO THE DRAFT PLAN DRAWN UP BY GUILDFORD BOROUGH COUNCIL FOR THE FOLLOWING REASONS:
- The plan for Normandy development is disproportionate.
- Destruction of the rural environment is unacceptable.
- Poor road infrastructure cannot accommodate massively increased vehicle movements.
- Land adjacent to A46 already has major flooding issues.
- Normandy is indeed a sensitive site, and should be protected, for the benefit of all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1011  Respondent: 15188961 / David Regan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the proposal to change the settlement boundary.

This is a relatively small area of land which is integral to the open, look and feel of the village and any change to this would materially impact the village.

In addition the only access is from Chinthurst hill which is a hugely busy road already and can’t manage the current volume of traffic. The road is often used by children on their bicycles and walking and would be a dangerous change to its use.

Please reject the proposal..

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I object to site A43 Garlick's Arch, and the destroying of wildlife habitats on this site.</td>
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<td>I object to site A45, The Talbot hotel, this is over-development in a conservation area, which will lead to even more traffic in the village of Ripley.</td>
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<td>I object to the insetting of local villages, which will allow too much development and destroy the place where I have lived all my life.</td>
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<td>I object to all erosion of the Green Belt</td>
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<td>I object to more development in one area of the borough than in most others.</td>
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<td>• I do not believe GBC has provided sufficient evidence for its stated house numbers. The increase appears to be at odds with the numbers given by the ONS and population growth projections.</td>
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<td>- The plan proposes that ‘Major new developments will provide..... educational facilities....’ (and other infrastructure); but there appears to be no additional 2ndary schooling attached to the enormous development proposed for Wisley.</td>
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<tr>
<td>- The Wisley &amp; Blackwell Farm proposals will put a huge strain on the A3 which anyone using it on a regular basis will be able to tell you is already under considerable strain.</td>
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<td>- The Wisley development has been previously rejected so it is disappointing &amp; surprising to see it back in the local plan.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>- Business and small commercial premises are not being given the protection they require in this plan. Despite a pledge for ‘protection of commercial premises’ and ‘provision for small business units’ (E2) by GBC and the assurances of policies E3 &amp; E5, small businesses are already finding it difficult to locate suitable spaces. GBC have already indicated its lack of consideration of these important contributors by allowing change of use of commercial units on Ranmore &amp; West Horsley to housing or other than light industry. I support the general aims of policy E1 whilst being concerned about the location of the new spaces and the transport links to them. Perhaps a better use of some the land earmarked for housing would be to provide the help for these SMEs.</td>
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Affordable housing is indeed required in our area but it needs to be in the appropriate location – where people work & want to live. There also needs to be good protection so that the properties are not taken out of the ‘affordable’ stock by investors. I did not see any such protections in the plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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- The doctors surgery, schooling and local facilities in the Horsleys are already struggling to cope with the current population and it is not clear how much new infrastructure is proposed despite the large number of houses suggested. Whilst I understand that the provision of these facilities may not be the responsibility of GBC, it is unacceptable not to include consideration of them in the plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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</table>
Policy I3 does not face reality. Developments outside the immediate village areas (eg that proposed for West Horsley) are not close enough to railway lines to encourage the use of public transport and will inevitably increase the number of cars on the local (overcrowded) roads. It is naive to suggest otherwise.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1018  Respondent: 15189377 / Anne Butler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I do not believe GBC have put forward a convincing case for the removal of the Horsleys from the Green Belt. This can happened only under ‘exceptional circumstances’ and the desire to build more houses does not constitute an exceptional circumstance. The proposal to remove these ‘open character’ villages from the Green Belt is at odds with the stated aim of GBC to ‘protect the Metropolitan Green Belt’.
• The planned move of the village boundaries has not been sufficiently justified by GBC in this local plan and appears to have the sole aim of allowing house building.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1024  Respondent: 15189377 / Anne Butler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I agree with the policies S1, P1, P3, P4, P5, D1, D2, D3, H3 & I4.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1025  Respondent: 15189377 / Anne Butler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In conclusion, I do not believe that there are sufficient differences between this version of the local plan and that which was firmly rejected by local people when put out to consultation in 2014.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/460  Respondent: 15192097 / Angelina Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed
houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heath Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heath SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object strongly to the ill-conceived plans for East and West Horsley, effectively making them into small towns.

**Infrastructure**

East Road/The Street and Ockham Road around the station and shops are busy all the time, backing up repeatedly during rush hours and school runs making them unsafe for cyclists, especially children. Few children are now able to cycle to school.

A considerable number of roads in the villages are ill-repaired and can only suffer further with increased traffic. We don't have many buses through the villages so each new house is likely to have at least one car, probably two.

The junction with the A3 at the Wisley roundabout is already stretched and backs up much of the day, but particularly between 6am and 9.30am.

Parking by the shops and village halls in both villages, and by the surgery and the station are already over-subscribed at most times of day.

**Drainage**

Recently built houses in West Horsley have had trouble the disposal of surface water. This will get increasingly bad as more and more foundations are dug. It is also possible that the existing drainage systems will not cope.

**Services**

The Raleigh School is still over subscribed, as it has been for twenty years. Are plans in place to increase local schooling? I think not. Nearby secondary schools are also over-subscribed leading to long journeys for 11+ children and additional traffic.

It is difficult to get an appointment with a preferred GP.

East and West Horsley are in danger of being turned into off-shoots of Cobham and Guildford. There are all too few villages left on the outskirts of London. We should be saving those we have left.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the sufficient evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/468  Respondent: 15192257 / Jennifer Cliff  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A43 Garlick's Arch, and the rampant destruction of wildlife habitats on this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/469  Respondent: 15192257 / Jennifer Cliff  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A45, The Talbot hotel, this is over-development in a conservation area, which should be cherished and prized by the borough, and not wantonly destroyed; The High Street is already regularly at a standstill because of too much traffic, and can take no more vehicle movements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1031  Respondent: 15192257 / Jennifer Cliff  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the insetting of local villages, which will destroy our environment, and shows no respect to those rate-players who live outside Guildford centre. There appears to be no recognition of the need for the conservation of these villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all erosion of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate amount of development in one area of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<p>| Comment ID: pslp172/1210  | Respondent: 15192257 / Jennifer Cliff  | Agent: |</p>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to the increase in the site (A35 former Wisley Airfield). The increase in size to 95.9 hectares will further increase traffic congestion and pollution, which are already above safe levels.</td>
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<th>Comment ID: PSLPS16/465</th>
<th>Respondent: 15192289 / Roger Banfield</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to site A43 Garlick’s Arch. The alteration to now allocate a minimum of 400 houses, and add 6 show people Plots will have a significant impact on the quality of life for people already living in the area, because of huge increase in traffic trying to use our already clogged roads.</td>
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<td>I object most strongly to the above proposal, even though, I do have a lot of sympathy for the decisions that you are having to advise on. It must be very tempting when a large developer says, let me build 1100 houses and I will build you a large secondary school.</td>
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However, if he said I want to build 1100 houses in the middle of a village of 1300 houses, in the green belt on a site which had not previously been considered then it probably would have been a non-starter. So let us see this proposal for what it is, a bribe.

That is bad enough but the developer is offering you something that is not required since the two secondary schools closest to Normandy, namely Kings College and Ash Manor are currently undersubscribed. A point that was very well made by Surrey Councillor Keith Witham.

Now if we look at the site we find it is bounded by a C road (Westwood Lane) and a D road (Glaziers Lane). Not only that but the C road has a dangerous single lane and bend under a railway bridge which has already seen one fatality to my knowledge. The D road also interacts with the railway via a humpback bridge on a bend.

But that is only part of the problem. Both Glaziers Lane and Westwood Lane meet the Aldershot Road via dangerous junctions and there has also been one fatality at the Glaziers Lane junction in recent memory.

The other spurious argument is that Wanborough Station will somehow be used by the children to get to the school. Not a chance. They will arrive by car, if for no other reason than cost or convenience.

I could talk about flood/sewage concerns and environmental considerations but there will be many others who are far better qualified to talk about these topics. Suffice it to say, even this Philistine ex-oil man noticed the impact on wildlife that the development of the 20 acre site to accommodate the Therapy garden, Village Hall, Bowls Club, Archery Club and Doctors’ Surgery has had. What chance the remaining wildlife with another 1100 house and a large school.

*What changes (2016)/further amendments (2017) do you suggest should be made to the document?*

**Attached documents:**

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**Comment ID:** PSLPS16/470  **Respondent:** 15192449 / John O'Reilly  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings**

My name is [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] and my address is [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] I strongly object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor
stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<th>Respondent: 15192481 / Thomas Collins</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I object to the inclusion of this site within the local plan. Development of this site will be used to justify future development plans in the area that will have a significant impact on the semi-rural location that the plans specifies; while careful design can mitigate the immediate impact, I believe that it would have significant impact on the area in the longer-term. Access to the site will be via Tannery Lane that will experience a greater volume of traffic in the near future following the approval of plans for 64 apartments at the tannery and building of the Marina and any further development at Clockbarn nursery would further exacerbate this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 15192481 / Thomas Collins</th>
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I object to the plans outlined for Site A43. This site is new to the overall plans and was not included in the Regulation 18 draft proposal and so it has not previously had any level of consultation. The removal of this land from the Green Belt requires exceptional circumstances and I do not see that the case has been made for this; in the long-term, developments such as this one may be detrimental to the overall goal of preventing urban sprawl and the merging of settlements such as Guildford and Woking. The provision of housing on this scale at this location would also have a significant impact on the schools in the local area; for example, Send infant school is currently being rebuilt but there is no plan for any increase in capacity. I understand that the site contains an ancient woodland and so the development would endanger trees from C16 and so there are conservation issues with the selection of this site.

I also object to the plans for the industrial development; the 2015 Employment Land Needs Assessment indicated a reduction of 80% in the requirements for employment floor space while this proposal is a repeat of that contained in a
previous draft local plan that used an older evidence base. If there is a need for further development of industrial space, there should be consideration given to an expansion of Slyfield as this seems to be a very appropriate site for such.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/613  Respondent: 15192481 / Thomas Collins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed development of the new 4-way interchange with the A3 at Burnt Common. While the provision of appropriate transport infrastructure and services is one of the most pressing issues facing Guildford borough, I am concerned that the combination of this junction and the proposed traffic calming measures in Ripley (as per the strategic highway assessment report) would serve to funnel a significant increased volume of traffic along the A247. This could be further exacerbated by the proposed developments of Wisley airfield, Blackwell Farm and Gosden Hill that are included in the local plan and it is hard to determine whether the highway assessment report made any attempt to model the impact of these developments. The new A3 junction would also encourage the use of the A247 as a ratrun whenever there are problems on the M25 that people would like to avoid, which would be very detrimental to the character of the local area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/616  Respondent: 15192481 / Thomas Collins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of this site for development in the local plan. This site is a new proposal that was not included in the Regulation 18 draft and has not been consulted on previously. This is a beautiful area of countryside that would be harmed by development and it fully justifies its current Green Belt designation. The subsoil in this area contains documented unsafe landfill waste which is currently vented, further calling into question its suitability for development. The roads in this area are occasionally narrow single track country roads and so access to this site would be restricted, calling into question the logic of providing 2 Travellers pitches here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the policy to remove the village of Send from the Green Belt. The Green Belt designation of the village of Send provides a key buffer zone between Woking and Guildford that should prevent them from merging in the future and I do not see the 'exceptional circumstances' referenced in 4.3.16. The Government notes that there are 5 main purposes to Green Belt land and I contend that the Green Belt designation of Send is important for maintaining the first 3 of these (listed below).

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

In particular, areas of land proposed for removal from the Green Belt include areas behind the school consisting of playing fields and woodland, which are important to the character of the local community and the quality of its schooling, as well as land around the Wey navigation near Carbridge that should not be encroached upon. I only recently moved to the area and I was attracted by the easy access to the countryside that living in Send would afford me and I believe that this proposal will threaten that, making Send a less appealing village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to policy A42 change as the increased number of homes proposed for the Clockbarn nursery site fails to account for the previous objections to the original 45 houses proposed for this site. I am concerned that it will have a significant negative impact upon traffic along tannery lane and, in particular, the junction between tannery lane and the A247. I am also concerned that this development is will negatively impact upon the Wey Navigation, as it will impede what are currently open countryside views protected by the Greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: pslp172/1392  Respondent: 15192481 / Thomas Collins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed changes to policy A43 as it takes no account of the many objections to this development made in the response to the 2016 draft Local Plan. I have seen no evidence of demand for plots for travelling showpeople at this site and I also do not see that there are any ‘exceptional circumstances’ that would justify development on the Green Belt at this location. The total number of homes proposed is very high considering the overall size of Send village without any planned increase in infrastructure necessary for such a development. It also seems likely to join Send and Ripley, thereby directly going against one of the key purposes of the Green Belt. I am also concerned about the impact of this number of homes upon the local traffic system.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1393  Respondent: 15192481 / Thomas Collins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 as this policy was deleted from the previous draft plan of 2014 due to the number of objections received and its inclusion now seems like a cynical attempt to ignore past concerns with the plans. I especially object to the change from ‘maximum’ in the 2016 Local Plan to ‘minimum’ as this will lead to the development of far more industrial capacity than is supported by the 2017 Land Need Assessment survey that indicated that the whole Borough needs under 4 hectares of industrial land and this proposal is for at least 10 hectares of development at Send, when there is also underutilised industrial units in Slyfield and Guildford that should be the primary site for development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp171/363  Respondent: 15192481 / Thomas Collins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy 2 of the Green Belt section (paragraph 4.3.15) that would inset Send Business Park form the Green Belt as this is an area of beautiful countryside adjacent to the Wey Navigation and any further development would reduce the openness of the Green Belt. I am also concerned about increased traffic along tannery lane that would result from further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/471  Respondent: 15192513 / Helen Wise  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

[Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

I strongly object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
• I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>No guarantee of enough affordable housing for young families</td>
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<td>Please take into account our concerns listed above when considering your plan</td>
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<td>Pedestrian and cyclists safety on crowded roads with no footway</td>
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<p>| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
| We are new to the area and object very strongly to the draft local plan you have submitted, our main concerns are: |
| Lack of protection for the green belt |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
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<td>Disproportionate housing development in our area, overloading schools, health services and public transport.</td>
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<td>Traffic concerns on trunk roads and lanes.</td>
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<td>Air pollution from thousands of extra cars, affecting children and the elderly</td>
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Comment ID: PSLPP16/1035  Respondent: 15192609 / Sarah Goody  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

New version of Guildford Local Plan - Objection to Shalford Green Belt/Settlement Boundary

With regards to the above, I object to this proposal. Please note this on your records.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/473  Respondent: 15192641 / Brian Parkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the adoption of the New Local Plan relating to the following sites and object to each one on the grounds set out below:

1) Site A25 Gosden Hill Farm - this site along with Site A35 and Send, Burnt Common and Ripley village sites A42, A43 and A44 account for almost 50% of the new homes planned by Guildford Borough Council. The transport and community infrastructure are currently and as proposed completely inadequate to support the proposed development.

2) Site A35 Land at former Wisley Airfield - this site along with Site A25 and Send, Burnt Common and Ripley Village sites A42, A43 and A44 account for almost 50% of the new homes planned by Guildford Borough Council. The transport and community infrastructure are currently and as proposed completely inadequate to support the proposed development.

3) Site A42 Clockbarn Nursery - This site along with Sites A23 and A35 and Send, Burnt Common and Ripley Village sites A43 and A44 account for almost 50% of the new homes planned by Guildford Borough Council. The transport and community infrastructure are currently and as proposed inadequate to support the proposed development.

4) Site A43 Land at Garlicks Arch - This site along with Sites A23 and A35 and Send, Burnt Common and Ripley Village sites A42 and A44 account for almost 50% of the new homes planned by Guildford Borough Council. The transport and community infrastructure are currently and as proposed inadequate to support the proposed development.

5) Site A43A Land at Burnt Common- This site is to provide new access onto the A3. Currently both Send Road and the centre of Ripley are already congested with Local traffic. the provision of a new slip road to the A3 will divert Woking to London traffic, which currently goes via Ripley Village centre, to now move to Send and provide additional congestion to that currently experienced and that which is proposed by the imposition of Sites A25, A35, A42, A43 and A44.
6 Site A44 Land at Winds Ridge, Send Hill - This site is proposing to introduce further housing onto a Lane that already is inadequate for current traffic and add more traffic to exit from Send Hill onto Potters Lane which is a blind junction and already has been responsible for a considerable number of serious accidents.

In particular I object to the proposed blanket destruction of the Green Belt in an area affecting Burpham, Send, Burnt Common, Send Marsh and Ripley which is totally in contravention of the Government's commitment for the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/1036</th>
<th>Respondent: 15192673 / Colin Goody</th>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

New version of Guildford Local Plan - Objection to Shalford Green Belt/Settlement Boundary

With regards to the above, I object to this proposal. Please note this on your records.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPA16/356</th>
<th>Respondent: 15192737 / Caroline Allen</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I grew up in West Horsley and visit every week with my parents who live there. I use the shops, hairdressers and restaurants on a regular basis. It is very clear to me that the proposals in the Guildford Plan are not thought through properly and totally unsustainable.

I am opposed to removing the village from the green belt. The Council do not appear to be adhering to its own policies in considering removal from green belt. It is vital to protect the balance of houses and green space for the sake of the inhabitants and the future sustainability of the area.
The proposal to build high volumes of housing would destroy the village due to the volume of people and transport and this would impact on air pollution, health and wellbeing of residents. The village layout and infrastructure cannot sustain such high volumes of housing. It would change a pleasant area into a stressful, busy thoroughfare squashed densely into a small area; placing a strain on sewerage, parking, shops and access to Doctors and schools.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/519  **Respondent:** 15194657 / Allan Spencer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A23

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I am writing to object to the proposed location of a Crematorium at Area A23 on Salt Box Road.

My house at [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] is located on high ground at a distance of some half mile from the proposed site of the Crematorium.

My house, due to its elevated location, already suffers at infrequent intervals from air pollution from burning plastics, otherwise known as dioxins. I am currently attempting to establish the source of these. The most recent such occurrence was over the night of 16/17th June 2016.

In the meantime my objection to the crematorium is that Crematoria exhaust smells of burning flesh and there is potential for such smell to linger in the atmosphere at the elevated position of my property.

As a general rule I would have thought that the location of Crematoria should be between population centres and not on the edge of a large population density.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/361  **Respondent:** 15194689 / Maria Stewart  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (north)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Objection to Shalford Green Belt/ Settlement Boundary

I object to the above proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/363  Respondent: 15194721 / Josephine Fearn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I live in Shere Road West Horsley. I have lived here for over 50 years.
I am sending you a list of some of the very strong objections to your housing proposals for West Horsley.
I came to live in a village, not a town.
Once you have taken away the Green Belt it will have gone for good.
Where do the extra children go to School?
What about Doctors surgeries? They are already too busy.
The roads are in a terrible state as it is. Double the traffic and a cyclist is going to get killed by riding into one of the many potholes.
There is not enough car parking facility now. Where are all the extra cars going to park?
Why do you want to spoil beautiful countryside?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2003  Respondent: 15195617 / Scott Brownrigg Planning (Natalie Walter)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Subject: Proposed Submission Local Plan Consultation (June 2016)

I write on behalf of our client in relation to "Guildford Borough Proposed Submission Local Plan: Strategy and Sites," published for consultation on 51h June 2016. Our client is the landowner of "Land at Hornhatch Farm, Chilworth."

Background

The site known as "Land at Hornhatch Farm, Chilworth" was proposed for removal from the Green Belt and allocation as a potential development site in the "Draft Guildford Borough Local Plan: Strategy and Sites" (July 2014) (site allocation no.68]. This was following consideration of the contribution of the site to the main purposes of the Green Belt; its location adjoining an inset settlement; the need for defensible boundaries; and deliverability considerations.

This potential development site has since been removed in the "Guildford Borough Proposed Submission Local Plan" (June 2016) ["the proposed submission local plan"]

Case for Retention in Forthcoming Local Plan

Our client objects to the removal of former site allocation 68 from the proposed submission local plan for the reasons set out below.

Need for Housing

Guildford Borough is currently not meeting its housing requirements. The 2014-15 Annual Monitoring Report sets out on page 9 that Guildford had a 1.4-year supply of housing. It further states on page 11:

"We are not currently able to demonstrate a five year supply of deliverable housing land without amendments to Green Belt boundaries and use of countryside land (against objectively assessed housing need of 693 homes a year)."

This is again acknowledged in paragraph 4 of the decision letter for appeal reference APP/Y3615/W/15/3132375, which states:

"The Council indicate that it cannot demonstrate a five year supply of housing land."

West Surrey Strategic Housing Market Assessment (2015) identifies that there is a need for a mix of house sizes across the housing market area as identified in Table 8.

In respect of the strategy put forward in the proposed submission local plan to deliver housing, the Council are placing undue reliance on Policy A35 : "Land at former Wisley airfield, Ockham." This site is proposed for allocation for the delivery of 2,000 homes. This one site is proposed to contribute up to 14% of the housing required over the plan period.

Our client considers that significant uncertainties exist in respect of the delivery of the Wisley airfield site and that this strategy is therefore unsound.

In addition, a planning application for the site proposed in Policy A7:"Land and buildings at Guildford railway station, Guildford" (planning application reference: 14/P/02168) was refused on 30th June 2016. This potential allocation includes redevelopment for approximately 350 homes. Our client considers that uncertainty exists over the delivery of this and other potential previously-developed sites thereby meaning the proposed number of homes to be delivered in the plan as set out in Policy S2 is unlikely to be met.

Further consideration should therefore be given to the delivery of smaller, sustainable sites, such as "Land at Hornhatch Farm."
Lack of Justification for Removal of Site

"Land at Hornhatch Farm" was included as a potential development site in the "Draft Guildford Borough Local Plan: Strategy and Sites" (July 2014). The reasons given for its omission from the proposed submission local plan are:

"Our spatial strategy and site allocations have been considered through the Sustainability Appraisal and this site no longer accords with the proposed spatial strategy in the Local Plan. The site was identified in the Green Belt and Countryside Study but is located within high sensitivity Green Belt."

Our client considers that the justification for the site's exclusion is based on subjective qualitative methodology used to assess the Green Belt, which has only been published for consultation at a late stage in the plan-making process. The forthcoming plan has therefore not been prepared in the light of a robust evidence base.

Sustainability

Allocation of "Land at Hornhatch Farm" would form a sustainable extension to Chilworth. The site was previously assessed in the 2014 "Draft Guildford Borough Local Plan: Strategy and Sites" as suitable for residential development within one to five years. The site is located in Environment Agency Flood Zone 1 (low risk of fluvial flooding) and is within 5 to 7km of the Thames Basin Heaths Special Protection Area (SPA) and therefore is beyond the zone of influence of this SPA.

Green Belt Considerations

Paragraph 89 of the National Planning Policy Framework (NPPF) states that local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. It also sets out that authorities should consider Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

Our client considers that there is a clear case for removal of the site from the Green Belt and its retention as a site allocation for residential development. The site would have clearly defined boundaries as required by paragraph 85 of the NPPF. Our client notes that additions to the Green Belt are proposed to be made elsewhere in Guildford Borough. This approach is supported.

Deliverability

The site is within single ownership, is available now and development would be achievable in the short to medium term.

Conclusions

Land known as "Land at Hornhatch Farm" should be retained as an allocation for residential development in the Guildford Borough Submission Local Plan: Strategy and Sites.

Guildford Borough is not currently meeting housing delivery requirements and the strategy put forward in Policy S2 is unsound due to an overreliance on particular site allocations, such as Policy A35: "Land at former Wisley airfield, Ockham."
A lack of justification has been provided for the removal of "Land at Hornhatch Farm" from the spatial strategy and there has been a lack of proper consultation on the "Green Belt Sensitivity Map."

Allocation of the site for residential use would have the benefit of bringing forward a deliverable sustainable extension to Chilworth that would contribute to providing much-need housing in Guildford Borough.

I trust that this letter is clear but please do not hesitate to contact me if you have any questions or queries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<table>
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<tr>
<th>Comment ID: PSLPP16/8384</th>
<th>Respondent: 15195617 / Scott Brownrigg Planning (Natalie Walter)</th>
<th>Agent:</th>
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Object to proposed Green Belt boundary showing retention of "Land at Hornhatch Farm" as a Green Belt designation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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The strategy put forward is unsound due to over-reliance on "Land at former Wisley airfield, Ockham." Please refer to letter dated 8th July 2016 for further detail.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: SQLP16/1197</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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Answer (if comment is on questions 1-7 of the questionnaire): (No)

The strategy put forward in respect of housing delivery and the Green Belt is inadequate. Please refer to letter dated 8th July 2016 for further detail.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1198  Respondent: 15195617 / Scott Brownrigg Planning (Natalie Walter)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

The strategy put forward in respect of housing delivery and the Green Belt is inadequate. Please refer to letter dated 8th July 2016 for further detail.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1199  Respondent: 15195617 / Scott Brownrigg Planning (Natalie Walter)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

N/A

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1200  Respondent: 15195617 / Scott Brownrigg Planning (Natalie Walter)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

Please refer to letter dated 8th July 2016.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3256  Respondent: 15195617 / Scott Brownrigg Planning (Natalie Walter)  Agent: Land Owner of Hornhatch Farm

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Our client is the landowner of “Land at Hornhatch Farm, Chilworth.”

Our client notes that the proposed housing target has been reduced in the latest consultation document and considers that there is a need for delivery of housing sites within the first five years of the plan period. Smaller sites around villages would contribute to this early delivery without compromising the overall spatial strategy proposed.

Paragraph 6.6.15 of the Sustainability Appraisal Update notes that there is a pressure to allocate sites that are able to deliver in the first five years and that smaller sites at villages tend to be relatively easy to deliver. Our client agrees that smaller sites would be relatively easy to deliver, in particular, “Land at Hornhatch Farm.”

Our client notes that paragraph 6.6.16 of the Sustainability Appraisal Update then states:

“In the light of this factor, there is a need to consider the option of allocating additional village sites. The following sites comes into contention…”

Site I- Hornhatch Farm, Chilworth (80 homes)... see further text in Box 6.10.”

Our client further notes that Box 6.10 ranks Hornhatch Farm higher than previously, as two other sites in Shalford Ward have been ruled out (one is constrained by access and the other is in the AONB). This ranking ahead of the two other sites in Shalford Ward is considered to be appropriate.

Our client has considered the growth options set out in the Sustainability Appraisal Update and notes that Hornhatch Farm is included in options 2, 5, 6 and 8. Our client considers that option 2, which includes Hornhatch Farm, would be a more
appropriate strategy for the Borough which would contribute to meeting housing need in a more appropriate way, whilst
taking into account the environmental and other constraints within the Borough.

Allocation of “Land at Hornhatch Farm” would form a sustainable extension to Chilworth. The site was previously
assessed in the 2014 “Draft Guildford Borough Local Plan: Strategy and Sites” as suitable for residential development
within one to five years. The site is located in Environment Agency Flood Zone 1 (low risk of fluvial flooding) and is
within 5 to 7km of the Thames Basin Heaths Special Protection Area (SPA) and therefore is beyond the zone of influence
of this SPA. The site is within single ownership, is available now and development would be achievable in first five years
of the plan period. It would thus contribute to much needed early delivery of housing.

Our client considers that smaller sites around villages would contribute to early delivery of housing in the plan period
without compromising the overall spatial strategy proposed.

Land known as “Land at Hornhatch Farm” has been ranked more favourably in the Sustainability Appraisal of the
Guildford Local Plan Update 2017 and our client agrees with this ranking ahead of two other sites within the Shalford
Ward.

Growth option 2 in the Sustainability Appraisal Update would represent a more appropriate strategy for the Borough and
allocation of the site for residential use would have the benefit of bringing forward a deliverable sustainable extension to
Chilworth that would contribute to providing much needed housing in Guildford Borough within the first five years of the
plan period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/365  Respondent: 15195937 / Lois Treacher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (south)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to moving the green belt boundary to exclude the fields behind Shalford Village Hall. These fields should stay
protected as green belt and not for future development.

As a resident of Kings Road, the elevation of land by the village hall is the highest in the local area and any housing
development built on it will tower over the village community and spoil the natural beauty of the area. It is well known that
the vast majority of local residents are also against this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1115  Respondent: 15195969 / Carrie Wheeler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
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Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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Answer (if comment is on questions 1-7 of the questionnaire): ()

I know I am one of many residents who has raised concerns over what is proposed, I do hope that you will listen to our objections, and see that what you have put forward is totally impractical and threatens to change the whole local environment, if our Green Belt status is removed, thereby allowing unlimited developments, we will no longer be a village, but a suburban ghetto!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1114  Respondent: 15195969 / Carrie Wheeler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object therefore to the number of developments planned in such a relatively small area, the infrastructure in around Send and Ripley, can only just about cope at present! An appointment at our local Doctors surgery can mean a wait of well over a week, the local schools are stretched to find places for the local children and then there's the traffic! The roads in the morning are jam packed queues common place and the roadways themselves damaged through volume of traffic and lack of maintenance, so how on earth are we going to accommodate another several hundred homes!

I object to the council viewing our villages as the answer to the housing needs of the area. The transport links from Send and Ripley are poor to say the least. The buses run once an hour, so without a car to get to a railway station, or towns such as Woking or Guildford would be very difficult. So how are all these new home owners going to get to work as with the increased traffic no one would get anywhere there'd be total gridlock!

I object to the lack of foresight given to the infrastructure required to accommodate all these additional families, where would the children go to school? How would you ever get a Doctors appointment? The roads would be permanently blocked and therefore become damaged, local shops could not provide for the demand, and as I mentioned earlier there is a very limited bus service.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1112  Respondent: 15195969 / Carrie Wheeler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
I am writing to object most strongly to the proposed local plan. We have lived in Send Marsh since 1975. My husband had to commute to London for work, but we wanted to live in an area beyond the suburbs of the city, which had some open space. The proposed construction of hundreds of houses in and around Send Ripley Merrow and the Clandons, will create a density of housing and therefore increased traffic and pressure on local services that will mean we become a suburban area too!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1113  Respondent: 15195969 / Carrie Wheeler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to 'bullet' point my main concerns:

I object to the erosion of the Green belt, the villages of Ripley Wisley Clandons and Send, are apparently earmarked to lose their Green Belt status, this is outrageous. Property in this area commands high prices, this is because of the location. Residents accepted the inflated price in return for being able to live in a pleasant semi-rural location, with the knowledge that as there was green belt land in the area it would not change too drastically or become over developed!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/284  Respondent: 15195969 / Carrie Wheeler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the fact that we have been given a very little time to digest what the planners have put forward, and put forward our thoughts on the proposals!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/190  Respondent: 15195969 / Carrie Wheeler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send Marsh/ Burnt Common

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am a resident of Send Marsh and have been for the last 40 years. As you can imagine I have seen some changes over that time, which I have accepted and adapted to, as they were well thought out and managed to maintain the character of the villages of Ripley and Send, BUT the draft plan devised for this area in the last 18 months is the destruction of the character community and picturesque landscape of our loved villages.

I object to the increased number of houses planned at Clockbarn nurseries from 45 to 60. This is an increase of 33% and objections were made on the original development! An increase will just further hit the already struggling infra-structure, clogged roads with too much traffic, road surfaces getting damaged, increased risk of accidents and health hazards from fumes, from the volume of cars.

Our green belt will become less and less, countryside views will be a thing of the past and there will be an increased risk of flooding as the area is allocated as flood zone 2. More houses will inevitably upset the already tested water table putting our homes at risk!

I object to the increased number of houses to be built at Garlick's Arch, also giving provisions for 6 travelling show people plots -Why? As far as I am aware there is absolutely no need for making allowance for that many plots, the circus does not come to town in Ripley and Send regularly so why are these areas necessary?

Why is it thought a good move to build on our preserved green belt land and have no distinction between the 2 villages? They will simply morph into one and all the individual character of the villages will be destroyed, the area will become one large waterlogged traffic jam!

It should also be noted that the area is contaminated with lead shot, accumulated over 50 years, which would be a hazard for building on.

I object to the new allocation of a Minimum of 7,000 sq m. Given to industrial and warehousing space. On the original plan this figure was given as the Maximum allocation of space. The call for these sites, seems rather excessive as areas such as Slyfield in Guildford have empty sites and the 2017 Employment Land need assessment showed that there has been a reduction in demand to 3.9 hectares for industrial land, our allocation is equivalent of 10 hectares of land and on GREEN BELT land!

With the traffic already on breaking point if all the housing plans go ahead, the addition of Lorries, and delivery trucks etc. Will just cause total gridlock So all in all I object most strongly to all the new proposals, stating many of the reasons in my letter. I completely understand that additional houses are required in the area, but Ripley and Send are already struggling Surely if we had wanted to live in a town, we wouldn't have come to live here! We pay a lot of money to live...
here, in property prices council tax, and maintaining the charm and beauty of the area, please respect our views, we are a united front in our upset at these ruinous plans and I beg you please to listen to our concerns and appreciate that these proposals are far too excessive and will bring nothing but problems upset and bad feeling.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/368  Respondent: 15196065 / Peter Collett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to focus on various aspects of the proposed local plan. I have lived here for 59 years.

I am particularly concerned about the following:-

(a) Very many of the inhabitants of the Horsleys bought property here because it is in the Green Belt; I want the Green Belt to be preserved for future generations.

(b) without knowing the precise statistics it is likely some 20% to 25% of the current population in the Horsleys are older than 60. Most of us live in houses with many bedrooms and I feel would like to downsize without moving outside the Horsleys if there was a greater availability of smaller houses or bungalows: if therefore new houses are to be built most of them in my opinion should have no than three bedrooms.

(c) it is not clear to me what provisions are being made for increases in services such as doctors' surgeries, school places, parking sites etc and who will bear the cost of developing such infrastructural needs: it strikes me all the focus in the new local plan is on the sites for new houses

(d) I am totally against the development of a satellite town at Wisley which would have a huge impact on the Horsleys because of its proximity.

I would be grateful if all the above considerations are taken into account.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp17q/55  Respondent: 15196065 / Peter Collett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I had a look at a copy of the above in the East Horsley library - a somewhat formidable document.

What I could not find was any reference to the necessary infrastructural plans (additional school places, extra medical facilities, car parking, etc) if 295 new dwellings are going to be built by 2024. I am also concerned about the type of additional houses and the provision of more care and nursing homes for the increasing numbers of frail and elderly.

I would hope the Council can block now the building of monster houses in place of bungalows or two/three bedroom houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/369  Respondent: 15196097 / Mark Groves and Katie Hamilton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The housing numbers proposed are for nearly 14,000 homes over 15 years from 2016 to 2031. This number is too high. The model used to calculate the number has not been seen or the assumptions tested by the council or any of its officers. It has been, on numerous occasions shown to be flawed by various 3rd parties. This housing target will result in the borough’s permanent resident population increasing at **4.5 times the rate of population increase during the period 2001 to 2011**. This population growth, by definition, is excessive and unsustainable for a gap town with many environmental, physical and infrastructure constraints.

Over 70% of the proposed housing is planned for land currently in the Green Belt. Housing need is not a reason in law for protected green belt land being used. It is perversely for so much housing to be planned for the green belt. Clearly, the green belt has not been used as a constraint as clearly set out in Government advice, planning policy guidance, the NPPF, case law, election manifestos and Ministerial letters to MPs.

For the West Horsley this is reflected in a 35% increase in the number of houses within 3-5 years of a plan being adopted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1121  Respondent: 15196097 / Mark Groves and Katie Hamilton  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the expansion of commercial land in the urban area losing the potential for further housing. Policy E7: Guildford Town Centre

There is no reliable evidence provided that the retail core of the Town Centre can support expansion of 45,000 sq m of additional retail space at North Street.

Online retail is set to account for 21.5% of total retail sales by 2018 from 12.7% in 2013, the highest online retail share in the world according to the Centre for Retail Research. March 2016, online sales rose 12.3%, and it was the third consecutive month in which more than 20% of all non-food shopping took place online, (British Retail Consortium and accounting firm KPMG) With such a high retailers will need just 70 high street stores to create a national presence compared to 250 in the mid 2000’s. An expansion on such a scale is negligent when the Council claims to be in such desperate need for housing.

Retail is a declining industry and should not be invested in by the Borough at the expense of housing in the most sustainable urban location, near employment and transport hubs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1118  Respondent: 15196097 / Mark Groves and Katie Hamilton  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages. There is too much traffic in our villages already and this plan will cause more congestion in West Horsley, East Horsley, Normandy, Ockham, Ripley, Send and Clandon, with no plan to improve that. The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses in such a small area means dangerous and unsustainable traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1120  Respondent: 15196097 / Mark Groves and Katie Hamilton  Agent:
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<td>1. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)</td>
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<td>The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Under the current economic climate post Brexit, it is unlikely any additional funding will be made available for new capital projects. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place</td>
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<td>1. I object to poor air quality concerns (Policy I3)</td>
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<tr>
<td>The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health. It has been shown that Wisley already has NOX levels above the EU legal limits and by law a school cannot be located in this area as a result</td>
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1. I object to not protecting the Green Belt (Policy P2)

Our Green Belt is precious. It is what protects London from urban sprawl; it preserves air quality; it prevents flooding; it is the city’s playground. It is for us to conserve and protect it. There are 5 legal purposes for Green Belt, and it meets them all:

- To check the unrestricted sprawl of large built up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

This policy is flawed and should have been amended. In the last consultation just six individuals, out of the c. 7,000 of those who took part in the consultation, supported the policy. Another 20 comments of support were from organisations such as: the University of Surrey, local councils (including Guildford), consultants (e.g. Savills) or landowners. But of the 1,371 who commented on the green belt policy 1,332 (97%) were against.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1116  Respondent: 15196097 / Mark Groves and Katie Hamilton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially West Horsley, East Horsley, Normandy, Ockham, Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car.

The development should be in urban areas where there is sustainable transport. West Horsley for example will see the number of housing increased by 35% within 3-5 years of the plan being adopted. The number and density of housing is not in keeping with the local area and is therefore against policies within the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1122  Respondent: 15196097 / Mark Groves and Katie Hamilton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. NO EXCEPTIONAL CIRCUMSTANCES

The local plan proposes nearly 9000 new homes to be built on Green Belt land (compared with ~ 50000 current homes in Guildford, so approx. equal to 18% of the existing homes in the borough) – a huge proportion. The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. Unmet housing need is NOT an exceptional circumstance in law. No exceptional circumstances have been disclosed. So the Green Belt boundaries should NOT be changed through the plan making process.

1. BROWNFIELD AVAILABLE

There is brownfield land available in the town centre which is being earmarked for commercial development rather than for housing. This is enough to meet our real needs for affordable local homes. There are enough vacant commercial sites to cope with genuine business need, and we have enough retail capacity already, so urban brownfield/derelict land should be used for housing.

1. DRAINS, WATER SUPPLY, FLOOD RISK, CONGESTION

Our drains, our water supply, our medical facilities and our roads cannot cope with the proposed number of new homes. Building this number of homes will lead to flood risk here and downstream (along the Wey and Thames). The planned development on Green Belt is therefore unsustainable.

In conclusion, I must ask you to revise the housing number, and to amend the Local Plan to utilise brownfield land rather than green field sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/370  Respondent: 15196161 / Michael Corlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Please note my following objections to the local plan:

1. I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford and is a very beautiful area. The Government advice is clear that housing needs alone are not adequate grounds for building on the Green Belt.

2. Send. I object to the significant changes from 185 houses in April 2016 to the presents 485 which will require a full consultation under Regulation 18, not the short cut of Regulation 19. These were not included in the previous consultation in 2014. These sites have been substantially changed and have not been properly consulted.

I object to the complete failure of GBC to identify existing brownfield sites within the urban area which could be developed before the open countryside and Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPS16/498  Respondent: 15196161 / Michael Corlett  Agent:</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

Policy A43: I object to the land at Garlick's Arch designated for 400 houses. This site was not in the Regulation 18 draft and has not been consulted upon. The industrial development is not required since the latest Employment Land Needs Assessment 2015 shows a reduction of 80% in required floor space from the previous draft plan. There is a 40ha site available at Slyfield. The additional traffic resulting from such a development would increase the traffic on Send Road and the Portsmouth Road at Ripley which are already gridlocked at peak times as is the A3.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPS16/500  Respondent: 15196161 / Michael Corlett  Agent:</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**
5. Policy A43a. I object to the proposed new interchange onto the A3 at Send Marsh/Burnt Common. This would add to the gridlock on the A3 at peak times which is already a major problem, and it would become a major access point to the A3 from Woking East Surrey and the approach roads and infrastructure are totally insufficient.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/499  Respondent: 15196161 / Michael Corlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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4. Policy A44. I object to the proposed development on the land west of Winds Ridge and Send Hill. This site is Green Belt and is also unsuitable because the subsoil is unsafe as it is an old land fill site and is currently vented because of noxious gases. It is also unsuitable because of the narrow lane and very dangerous blind corner with the junction of Potters Lane and quite unsuitable for Travellers Pitches with their lorries and caravans. The additional traffic generated would be impossible on an already narrow roads which gets very congested with school traffic and parking, particularly during the morning and evening rush hours.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp173/27  Respondent: 15196161 / Michael Corlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Policy 2 Green Belt at paragraph 4.3.15

I object to the proposal to take Send Business Park out of the Green Belt. It is an old site on the banks of the River Way with very limited access via Tannery Lane and further development of this site would present innumerable problems. The land floods and the increased traffic created on this narrow lane which is single track for much of it with few passing places, would prove impossible. It is the Governments policy that Green Belt lands should be preserved as such.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: pslp172/313</th>
<th>Respondent: 15196161 / Michael Corlett</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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<tr>
<td>Policy A42 Clockbarn Nursery, Tannery Lane, Send</td>
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<td>I object to the fact that the proposed number of homes has been increased from 45 to 60 which is incredible you having had so many previous objections to this site. Tannery lane is a very narrow lane with poor and dangerous access at either end and quite unsuitable for a large development. The site is on Green Belt Land which is subject to flooding and will the development will impact on the River Wey Navigation. There are already sewage problems in this area as the local plant is unable to cope with excess rain water.</td>
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<td>Policy A43 Land at Garlick’s Arch, Send Marsh</td>
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<td>I object to the inclusion of 6 Travelling Showpeople plots for which there is no demand. This is a beautiful site of ancient woodland and subject to flooding. Is Green Belt and there are no exceptional circumstances as to why this should be developed. All my previous objections regarding increased traffic still stand.</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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Policy A58 Land at Burnt Common, Send.

I object, in that this had previously been deleted from the 2014 Draft owing to the objections raised and there is no demand for industrial land in the middle of Green Belt when there are still empty sites at Slyfield. Once again the traffic generated would cause gridlock on already very congested roads. The 2017 Employment Land Need Assessment show a reduction in demand for the whole borough to 3.9 hectares and to over allocate 10 hectares to Send is entirely disproportionate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1135  Respondent: 15196257 / Vanessa Ruck  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the careless destruction of the Green Belt. The greenbelt was created to protect from urban sprawl, protect the countryside and provide space for recreation outside of big cities… As a local resident/as a regular visitor/I work in Ripley… I object to the reduction of these green spaces. 13,860 new houses is not sustainable and will damage local communities by overdevelopment – the plans proposed growth based on the SHMA report are more than double the figures used in previous plans. The Guildford local plan proposes an unsustainable increase in population, which will not be sustainable on the current or proposed road networks… As a regular commuter through these villages, I am all too aware of the problems that increased traffic will cause… increased commute… /I work in Ripley…/school run…the A3 and M25 already suffer from congestion…]

I object to the local plan on the grounds that it will destroy several landscapes of beauty for current residents and visitors as well as future generations. Decreased enjoyment of the area, views, fresh air…

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/376  Respondent: 15196289 / Graham Kite  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (south)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposed changes to move the Green Belt Boundary. The fields adjacent the village hall are an important feature of the village. Any development on those fields would have a negative impact, including increasing traffic flow on already over-stressed roads at peak hours.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/1137  **Respondent:** 15196353 / Rosie Cormack  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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I object most strongly to any building on the GREEN BELT.

I object to any villages that are currently in the GREEN BELT being removed from it, such as the Horsleys, Ripley, Send, Clandons. There can be no justification for it as there are plenty of BROWNFIELD sights still available to accommodate the suggested requirement for some 693 homes per year for the next 20 years.

I object to the possibility of Guildford being increased by some 25 per cent due to the foregoing predictions which are unfounded.

I object most vigorously to any Brownfield sights being used for further factories, offices, warehouses and shops that would not include very substantial affordable housing in their planning footprints.

I object very strongly to any change in current settlement areas.

I object strenuously to any diminution of the current GREENBELT (National Planning Policy Framework Para 79).

I object to any widening of the village boundaries to encroach upon the current Greenbelt.

I object to the scale of new building throughout the Guildford borough which can not be reasonably substantiated and appears completely unfounded and a figment of some distant planners imagination.

I object most strongly and specifically to the proposed building on Gosden Hill Farm which is in the GREENBELT and designed to keep West Clandon from being absorbed into the Guildford sprawl.

I object again most vociferously to any development of Garlick’s Arch with a view to creating a spur off the A3 going Southbound or Northbound as the surrounding infrastructure would be totally unable to handle any increase in vehicular traffic. Our already overcrowded village roads would not be able to cope with any increased traffic and would cause a highly increased possibility of injury or death to the local population as sidewalks are virtually non existent or indeed too narrow to accommodate the current village populations.

I object most strongly to any change being made to Newlands Corner, an area of Outstanding Natural Beauty that is FREE to everybody to enjoy and must remain so.

It is a fact that Surrey County Council has no funds available to repair many of the roads in and around West Clandon -
specifically the junction of the A247 and A246 at the South end of West Clandon, and it would appear the Highways Authority have no interest.

The GREENBELT is sacrosanct and must be fully and totally protected at all times for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/513</th>
<th>Respondent: 15196385 / Lucy Jamieson</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a VITAL role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Answer (if comment is on questions 1-7 of the questionnaire): ()

It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.

It is further from railway stations than any other identified strategic site.

It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)

Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)

Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.

Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe, putting my family and others in danger.

It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum. RHS Wisley traffic already cause frequent congestion by traffic on local roads – there is already vulnerability and this will get worse.

1. The associated traffic increase from the RHS has not been taken into account.
2. The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account

There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis – again, more danger and potential fatalities.

The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station

It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.

I object to the increased area of the site as this now abuts additional heritage assets, including Upton Farm and Bridge End House negatively impacting the setting of these buildings and the wider Ockham Conservation Area.

I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB and destroy the far reaching countyside views for future generations. Surely there is a responsibility to maintain this?

object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)

I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objections from local residents and statutory consultees – Why bother to consult if you then ignore the overwhelming popular view?.

I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

I object to the extension of the plan period by 1 year as it has not been identified as a major change

I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

It is my belief bearing in mind the reasons listed above from a not exhaustive list that this plan is unsound and not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/1143  **Respondent:** 15196449 / Fran Jepson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

- Lack of essential infrastructure. Where are the schools going to be built to accommodate the instant growth in the population? Our schools in and around Burpham are already stretched to breaking point, with most of them having taken extra form intake for the past few years. Burpham Primary is a prime example. There was obviously no thought given to the extra traffic a further form intake would cause across the board. What was a lovely village primary school is now an impersonal business venture that over the past 4 years has gained 120+ students, and will gain virtually 100 more over the coming years. Boxgrove has also increased in size as well as
other primary schools. Where will the children go when the move up to senior school? Bus routes have also been adjusted/reduced making parents drive their children to school thus creating more traffic.

- Also, where are the new doctors? Increasing new housing by 693 pa, which incidentally is double that of the 322 put forward in the 2012 plan is not sustainable. Why has this number doubled and where will the influx of people come from that this extra 371 houses per annum suggests is necessary?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/1142  **Respondent:** 15196449 / Fran Jepson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Loss of our green belt - once the green belt is built upon we will never get it back. Our children will grow up in an poorly thought out urbanisation

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/1144  **Respondent:** 15196449 / Fran Jepson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

- Disproportionate level of development in a single area - why is it necessary to build a new village at Gosden Hill (2000 houses) that will not have the appropriate infrastructure to support it. 1800 at Blackwell Farm, 2000 at Wisley, 500 at Garlick,s Arch and more importantly 1000 at Slyfield which could well turn into 1700 is not appropriate. Slyfield is also dubious as a site because of what is buried beneath the land, and the risk of flooding.

  - Consultation period - this is very limited and it would appear that the council are rushing things through without proper thought. Making a decision on the plan before the tunnel under Guildford has been properly assessed/ agreed seems ludicrous. There will be a creation of so much traffic before a solution has been agreed to deal with the said traffic.

For the above reasons and more, I object to the Guildford Plan. The level of housing being suggested is double what was originally mooted and I feel is not appropriate for Burpham and the surrounding areas.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
We strongly object to the revised local plan on the basis that the housing numbers required appear to have been calculated out of thin air. There is no transparency in the way the new numbers have been calculated and therefore these should not be used to over populate an already overpopulated borough.

The plan for Gosden Farm has been based on building on green belt land. The local plan does not address the need for housing without building on green belt land which I assumed was not acceptable. The additional traffic through Burpham that this will cause is also not acceptable. The building of the supermarket Aldi with access only via Burpham Lane already causes gridlock and not just at peak times. Introducing a minimum of 1700 cars driving through Burpham if this development gets the go ahead is not acceptable. The air pollution of this additional traffic will not be acceptable.

Pushing more traffic through Burpham is not an acceptable alternative as there is insufficient room on the London Road as it stands now. Adding additional housing into an already overpopulated area will mean that Burpham will disappear into an urban sprawl that will undoubtedly please Guildford Borough Council as they have already let several developments spring up where one house has been changed into three houses, already adding more traffic to the overburdened roads.

For the above reasons I strongly object to the local plan that appears to have been made on dubious calculations without thought to local residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the 2016 draft local plan due to:

Brexit and the expected reduction of demand for property, and the lack of evidence for alleged housing need numbers.

Loss of Green belt

Lack of specific details of essential infrastructure requirements, given the current very high levels of congestion already evident on the A3 and surrounding roads. (The A3 is stationary twice a day every day past Guildford, the town is regularly grid locked)

No decision on an A3 tunnel.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/381  **Respondent:** 15196513 / Alison Precious  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the lack of evidence for the alleged housing need numbers

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/1152  **Respondent:** 15196513 / Alison Precious  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the lack of immediate provision for new schools
2. I object to the lack of any immediate provision for Doctors Surgeries

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
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<tr>
<td>1. I object to all erosion of the Green Belt.</td>
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<td>I object to any “in setting” (ie removal of any villages from the Green Belt</td>
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<td>1. I object to the disproportionate amount of development in one area of the Borough</td>
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<td>2. I object to the limited consultation period.</td>
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<td>3. I object to the last minute inclusion of new sites with less than 2 weeks notice</td>
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<th>Respondent: 15196545 / Jim and Rachel Brady</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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Please record our objection to the plans to build 533 new houses in the above area!! All the present facilities would be swamped ie schoole roads etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1154  Respondent: 15196577 / Kate and John Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Local Plan as the development proposed is not sustainable (Policy S1) the new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick’s Arch. We are losing too much of our countryside and rural areas - please keep some of the UK as it should be.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/385  Respondent: 15197153 / D Woodhams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (south)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECTION TO SHALFORD GREEN BELT/SETTLEMENT BOUNDARY

I OBJECT

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1162  Respondent: 15197185 / Son Ruff  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We are writing with reference to the 2016 draft local plan and wish to notify you of our objection to this.

Before any local housing developments in the proposed areas - Blackwell farm, Wisley, Slyfield, Send, Garlick’s Arch - essential road infrastructure must take place, which includes building the A3 tunnel.

Before the building of Aldi in Burpham we could travel along New Inn Lane with some traffic congestion but ever since its construction (in order for us to get to Orchard Road) there is on average a 30 min plus queue all the way along that road during peak hours. This is because at the roundabout, there is a constant stream of traffic from the right (usually the A3 or from Jacobs Well) and as you have to give priority to the right, this lane of traffic hardly ever moves, particularly if you want to turn right to Sainsburys or if you live along any of the side streets on London Road like we do. This is not effective or productive when you have two small children in the back of a car. We now have to resort to going along Merrow Lane as that is the only other access road and start queueing up with the A3 slip road traffic.

We have lived in Guildford for more than 10 years and although the housing developments continue there has been little investment in expanding the road infrastructure. We did feedback to the previous local plan and none of the proposals to alleviate congestion such as the roundabout in Merrow at the top of Park Lane were implemented, i.e. make the roundabout a small hump which can be driven over as those coming from Clandon that want to turn right cannot do so because of those coming from Burpham who want to turn right and then clog up the roundabout.

It is the only town in the UK that has a hideous system of one way access points to and from the A3 which forces many people to travel past Ladymead just to join the A3 southbound.

The proposed local housing developments will add 6000+ homes without much change to infrastructure. Already it takes more than 30 mins to travel anywhere around Guildford. Do you really want Guildford to be renowned for its stupid road infrastructure? We will become the laughing stock of the south.

The plan also shows a disproportionate level of housing development in these areas, coupled with a limited consultation period, lack of any detail on essential infrastructure and lack of evidence for alleged housing numbers which has more than doubled from the previous figure in 2012.

A positive decision on the A3 tunnel needs to be taken before Gosden Hill and the other areas can be earmarked for development.

We urge you to consult in an appropriate period and to think of the hellish lives of residents and future generations should you implement this plan without the required road infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>PSLPS16/518</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Wisley Airfield

3.1. The proposal to include this site in the Local Plan and remove it from the green belt is puzzling as it was the subject of a planning application refusal in recent months.

3.2. The reason given for the refusal was because the site was within the Green Belt. So why do that when GBC had the clear intention of moving the site out of the Green Belt within next few weeks? There were other reasons that were glossed over in the report that are not resolved by GBC recent actions. The impact on infrastructure, which is clear for all to see, only gets a passing mention. For example, the transport report by the developer's consultants has been torn apart following many comments and objections. Missing traffic numbers, grossly understating the impact of the development on trunk roads and local roads. The information provided in the Local Plan implies that if billions are spent on road and transport network improvement the development at Wisley could proceed with improvements funded by developers.

3.3. There appear to be 58 projects included in GBC wish list; statements have been made that for the housing program to move forward, it would require the majority of the programme of work to be delivered. At this point in time only 4 of the 58 projects have received committed funding even one of these is in doubt if Highways England is to be believed.

3.4. No solutions have been arrived at for the problems in the centre of Ripley. After more than 2 years of meetings and discussions involving SCC and the developer's consultants no workable solution has been identified. GBC local plan dismisses this significant problem saying it will be resolved with a "management solution". I would be very interested to hear what that solution could be and I suspect SCC highways would also be interested.

3.5. Both Highways England and SCC Highways issued holding objections in relation to the recent planning application for the Wisley site. This is, apparently, all they can now do as they are unable to refuse an application. If these two key agencies have expressed their grave reservation over the potential development on this site, why do GBC insist in promoting the site?

3.6. Under the latest Housing and Planning Bill, if sites are included in a local plan there is a presumption in favour of an application with matters of detail only to be resolved. Large slices of GBC traffic solutions are based on survey and analysis yet to be done when more detail can be made available. In other words they do not know the full extent of the problem. This information will be the result of a further examination of the issues and with solutions that are not currently apparent. I suppose this is the reason for the vagaries of the budgets. The only beneficiary of such an ill conceived and ill prepared approach will be lawyers representing the future developers when they are asked to pay for or contribute towards any mitigation.

3.7. The budget costings are said to err on the conservative side. Worked out on the back of a fag packet is more the case! How can anybody be expected to take a budget plan seriously when the individual projects have a budget plan estimate in the range of £100m to £250m on a single project. It is no wonder only 4 of the 58 projects have any commitment.

3.8. There are serious environment issues on the Wisley site and the nearby SPA. Pollution levels already exceed EU levels. The proposed SANG provision is immediately adjacent to the SPA a point that was criticized by Wildlife Trust, and Forestry Commission and initially by Natural England. The latter making a reversal of earlier comments following changes in personnel.

3.9. I therefore Object to the Wisley Airfield site being taken out of the Green Belt where it continues to serve the purposes intended by its original inclusion.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1163  Respondent: 15197249 / Deborah Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Ref Proposed Submission Local Plan

I would like to raise the following objections to the above Plan:-

1. **Housing**

1.1. The target for new homes outlined in the Local Plan represents a 25% increase in the housing stock of the borough; The Office of National Statistics (“ONS”) projects a population increase (including that for economic growth) of some 15% for Guildford Borough over this same period. Why do we need the 25% increase in homes?.

1.2. The infrastructure proposals are inadequate even to meet existing needs let alone the proposed additional developments in the Local Plan.

1.3. Policy S2: is a Borough Wide Strategy (the “SHMA”), which looks at how the annual housing target of 693 homes is made up. It estimates that 517 homes per annum arise from ‘the demographic figure (supported by ONS office national statistics) projections. To this GBC plan has added another 120 homes per annum in order to ‘support extra economic growth’, a further 31 homes per annum to ‘improve affordability’ and 25 homes due to ‘student growth’, all of which totals up to 693 homes per annum target more than in the rejected plan.

1.4. This does not make any sense as we do not need an uplift for extra economic growth. Current growth patterns are included in ONS projection.

1.5. The increase of 25 homes to ease affordability issues will result in only 10 social/ affordable houses being built. It would be better if planning permission was only granted for 1, 2, 3 bed properties for a period of 2 - 3 years with a restriction on the percentage of 4 & 5 bed if required. This would help to provide a better mix for both market and affordable homes in all parts of the borough.

1.6. Student accommodation should be provided by the university. The University’s expansion should be in line with what it can deliver in terms of extra student accommodation.

1.7. GBC Affordable Housing Policy H2 is proposing that all development sites (other than those with less than 10 units) will be required to have 40% of their homes offered as affordable housing. This to be on all site irrespective of where they are or where the homes are most needed. Local authorities are able to take payments in lieu from developers, but GBC have rejected this option. Why? This “one size fit all” policy will mean that homes will be built where they are not needed and not enough will be built where they are needed. Developers are therefore able to influence the level and type of affordable homes built. The housing mix in the Local Plan suggests more 1-bed homes should be built than 2-bed. GBC have ignored the figures from their own needs data (where more 2-bed homes are needed) in favour of those produced by
their external consultants report. These reports have been influenced not by sound internal data from their housing records but by the vested interests of the development lobby. The only changes that can be made to the number on each site is at the developers discretion and at their request. GBC are unable to promote changes.

1.8. If any affordable social housing is built in a village like East Horsley and on most of the sites in West Horsley they could be lost to the market as there is no rural protection against the right to buy or enfranchise.

1.9. Most of the social housing in EH has already been lost as a result of right to buy. GBC should take payment in lieu from developers and build the social affordable home in more urban areas where they are most needed.

1.10. GBC’s new policies will encourage the buy to let investors who will receive a good return on their investment.

1.11. POLICY H3: Rural exception homes are required on a small scale and can be retained as affordable and built on the edge of village and have significantly less impact on the Green Belt.

1.12. I therefore object to the proposed housing numbers and policies based on the above points.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1164 Respondent: 15197249 / Deborah Harris Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Green Belt

2.1. Proposed Submission Local Plan includes the statement “We will continue to protect the Metropolitan Green Belt”. No this is not the case. The housing policies set out in the Proposed Submission Local Plan; indicate that 65% of proposed new developments will take place on land that is currently in the Green Belt.

2.2. Under NPPF regulations GBC and other Local Authorities are permitted, once they have determined their Objectively Assessed housing Need (OAN), to make allowance for factors which may constrain the delivery of new housing. Constraints such as the need to protect the Metropolitan Green Belt, or the restrictions required to protect the Surrey Hills Area of Outstanding Natural Beauty, or land costs etc. Although these designated areas make up a large proportion of the land area of Guildford Borough, GBC has made no attempt to reduce its housing numbers in order to take account of such constraints. They have instead increased the number, beyond that required for normal growth projections to satisfy their own egotistical view on a path of massive economic growth.

2.3. Currently development is permitted within the settlement boundary, where villages are washed over by the green belt with particular planning regimes being applicable that have proved beneficial in preventing the urbanization of many villages. They are very successful, because of the non urban nature of small scale new development to help to retain the openness of the villages. These villages house, in some cases, a population of 4000 plus people, yet are regarded by residents as small villages. For those who drive through these areas they do not see a mass of urban style developments but trees and hedges, views between homes, views through spaces that don't reveal row upon row of homes but space and openness with trees amongst the homes and a variety of scale and architecture.
2.4. Washing some of the larger villages will result in them becoming their own urban sprawl as a result of disproportionate infilling.

2.5. Changes to settlement boundaries have been made in order to make more land available for the developers under the guise of making the boundaries more defensible. Many straight lines have now been drawn which result in villages developing hard edge profiles with buildings replacing the fragmented softer edge of the original hedgerows, trees and green fields.

2.6. Loss of Green Belt resulting from these boundary realignments can only be justified in exceptional circumstance. None of which have been provided. Moving a boundary from one already defined boundary to another, again can only be done in exceptional circumstance. Housing need has already been turned down as such an exceptional circumstance.

2.7. I object to all these changes being made to the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I write to you with serious concerns over the draft plans for the plans to expand the housing in the Ripley/Wisley/Clandon area.

My family & I are residents of Ripley. I understand the need for additional housing in the area but have serious objections to the current plans put forward among our local villages. The **OBJECTIONS** I have are:

1) **The plans for the manner in which to alleviate the additional traffic in the area**: already the roads through Ripley become un-usable at certain times of day and the noise, pollution and lack of traffic control is unacceptable. The new plans will most certainly not alleviate the issue but make it many times worse. The plans for the new on/off ramp at Clandon will only serve to increase the traffic as opposed reduce it as well.

2) **The erosion of the green belt.**

3) **The lack of provision for infrastructure, such as schooling & doctors surgeries.**

4) **The removal of our villages from the green belt.**

5) **The disproportionate amount of development in one area**: ours are some of the most popular villages in the region and the reduction in their charm & beauty will be terminal for the future of them.

6) **The lack of consultation period.**

Please feel free to contact me should you wish to discuss in greater detail the issues that I have. There needs to be serious discussion with villagers on the current plans and greater consultation & effort to find more appropriate sites for new housing which could be built with suitable infrastructure in place.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/391  **Respondent:** 15197345 / Louise Harris  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )

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I object to the final draft plans relating to Send and Ripley for the following reasons:

1) I object to the increase in the number of homes being planned which was 185 in April 2016 and has now increased to 485 and this has been done without any consultation.

2) I object to the removal of Send and Ripley from the Green Belt. Send provides a strategic buffer between Guildford and Woking with lots of areas which are used for local recreation.

3) I object to the 400 houses and the 7,000 sq m of industrial and warehousing at Garlick's Arch. This site was not included in the Regulation 18 draft and has not been subject to consultation.

4) I object to the new 4-way interchange onto the A3 at Burnt Common which would have disastrous effect on the traffic in Send and Ripley which is already congested and used as a cut through from Woking to the A3.
5) I object to the new proposal of building of 40 homes and 2 travellers pitches west of Winds Ridge and Send Hill. This is a new proposal and not included in the regulation 18 draft and has not been consulted upon. Development of houses is inappropriate as the road is very narrow with no pavement or lighting. The land to be used for development was previously used for landfill waste which has to be vented. The area is very popular and is an area of beautiful countryside which would be spoilt by any development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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As a resident at the above address for 29 years, I wish to make a strong objection to “The Guildford Borough Council’s Proposed Submission Local Plan: strategy and sites” and, in particular, to the proposals for Policies A36, A37, A38, A39, A40 and A41.

Firstly, I object to the proposed Plan on principle because:

Policy P2: Green Belt and the Countryside/Policy P1: Surrey Hills AONB. No “exceptional circumstances” have been demonstrated for removing West Horsley from the Green Belt by insetting and extending the 2003 Local Plan Settlement Area boundaries. The Green Belt & Countryside Study is flawed and the Key Evidence document “Guildford Borough Economic Strategy 2013-2031” makes no case for locating 385 new homes in West Horsley.

Policies S1 Presumption in favour of Sustainable Development, S2 Borough Wide Strategy, H1 Homes for all and H2 Affordable Homes. The addition of 385 new homes for West Horsley across four sites represents an increase of 35 % on the existing number of houses which is unsustainable (only one small shop, no post office and very limited bus service) and is totally unproven and inappropriate (The West Horsley Parish Council and Surrey Community Action Housing Survey: May 2014 only identified a need for about 20 affordable homes for local people).

Secondly, I object because insufficient provision has been made to improve the following essential infrastructure:

1. The Raleigh School has been full for many years and places at the Howard of Effingham School are limited with long commutes for children forced to attend other secondary schools. Relocating and building ever larger local schools does not necessarily enrich the children’s educational experience during their formative years.

1. The Horsley Medical Centre is always very busy with delays before seeing a doctor. The alternative of attending the A&E Department of the Royal Surrey County Hospital only aggravates the problems of an over-stretched NHS.

1. The Street and East Lane are already congested with early morning road traffic due to on-street parking, a single lane chicane and numerous school buses. Ockham Road North and the A246 are similarly busy. There is thus the serious risk of injury to school children and cyclists from increased traffic at a time when drivers can be tempted to rush to their early morning destinations.
1. Car parking at Horsley Railway Station on weekdays is normally full of early morning commuters to London. This makes it very difficult/impossible for people to travel by train anywhere later in the day causing problems of increased road traffic and is in conflict with the Government’s policy to reduce carbon dioxide emissions.

1. Flooding on The Street, East Lane and Ripley Lane is already a problem after heavy rainfall. There are also known sewage overflow problems in the Ockham Road North/Green Lane area. The loss of natural drainage with land use change and additional household waste water will aggravate these problems.

This letter is a plea that Guildford Borough Council withdraw the proposed Plan, scale down the scope/content and seek alternative sites and solutions to the provision of large numbers of additional homes in West Horsley and surrounding villages. The Government’s advice is clear – the housing need alone is not adequate grounds for building on the green belt and any major new development must take account of any need to upgrade the necessary infrastructure. The GBC should reconsider and revise the Plan before proceeding any further.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/520  Respondent: 15197697 / Ed Jamieson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a VITAL role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/1177  Respondent: 15197761 / M B Kelly  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This is a plan which is going to completely ruin an area

1) lack of green belt protection
2) over loading of schools, health services and public transport
3) pedestrian and cyclist safety will be compromised

I strongly object to this whole planning GBC Plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1169  Respondent: 15197761 / M B Kelly  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

To the Planning Policy (Local Plan Consultation)

I am writing to object to the Draft Local Plan for Wisley Airfield, Gosden Hill Farm and Garlicks Arch.

There will be chaos in the area with the proposed new traffic and new sliproads onto Burnt Common roundabout. The A3/ M25 is already a very traffic spot and getting gradually worse putting a strain on the adjoining roads. We already have an influx of cyclists and heavy traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/396  Respondent: 15198081 / Anita Hogben  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Page 2831 of 2855
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5. **I OBJECT TO** the lack of immediate provision for new schools.

6. **I OBJECT TO** the lack of any immediate provision for Doctors Surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/395  
**Respondent:** 15198081 / Anita Hogben  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **I OBJECT TO** the lack of evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1170  
**Respondent:** 15198081 / Anita Hogben  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **I OBJECT TO** all erosion of the Green Belt.

1. **I OBJECT TO** any “in-setting” of any villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT TO the disproportionate amount of development in one area of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Having moved to West Horsley 38 years ago to escape the urban sprawl of suburbia, the exact same thing seems to be about to happen in the Horsleys if the new local plan is implemented. There are already problems with parking at East Horsley medical centre, Horsley railway station and the local shops.

The roads adjoining the Raleigh school get choked up twice a day with school traffic already. With the inevitable increase in traffic that 533 new houses will bring, this is another situation that can only get worse.

The amount of heavy goods traffic using Ockham Road South and Ockham Road North as a short cut between the A246 and the A3 at Wisley has increased quite significantly and there are sections of Ockham Road South that are too narrow for this kind of traffic. There is also a problem on this road with the surface water not draining away efficiently, resulting in any pedestrians who are trying to get to Horsley station, the medical centre and the local shops having to run the gauntlet of being splashed and soaked by the passing traffic.

It would appear that the existing drainage infrastructure is not capable of dealing with the current surface and waste water problem. This situation will not be improved by concreting over large areas of green belt land and replacing it with high density housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to register my protest at the proposed new housing development in East Horsley.

I strongly feel that this development will overstretch the local infrastructure leading to further strain on already congested local resources.

The added traffic, pressure on schooling and regrading of the rural environment would be severe.

This project is unwise and ill thought out.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1175  Respondent: 15198305 / Georgina Coro  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the plan to build 14K houses across the borough of Guildford.

The town cannot cope with another 30-60K+ people coming to live in this area.

Already, the town is congested and schools, doctors surgeries etc are already struggling to cope for demand for their services.

We moved to the Borough recently and we enjoy Guildford the way it is - please do not ruin the town by making it unbearable to live in for the residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1176  Respondent: 15198305 / Georgina Coro  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Another reason why we moved to Guildford was for the access to the beautiful Green Belt countryside. We would be absolutely devastated if the beautiful countryside was used to build new housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/401  Respondent: 15198337 / Jack Tallick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/402  Respondent: 15198337 / Jack Tallick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID:</th>
<th>PSLPS16/524</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for its removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance.

The Plan states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch.

The site is not appropriate because:

- There is no sustainable transport infrastructure.
- The site is liable to frequent flooding
- The site has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.
- There are no plans to improve local schools, medical or utilities to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/523</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

North facing ramps to the A3 at Burnt Common would be a disaster for local communities, which do need to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. E.g. all traffic from London/M25 to Woking would go through Burnt Common, Send and Old Woking. This is not sustainable as this cannot be improved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1183  Respondent: 15198337 / Jack Tallick  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1185  Respondent: 15198337 / Jack Tallick  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<tr>
<th>Comment ID: PSLPP16/1180</th>
<th>Respondent: 15198337 / Jack Tallick</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

There is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that.

The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses means dangerous and unsustainable traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/1186</th>
<th>Respondent: 15198337 / Jack Tallick</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the lack of proper infrastructure planning for sites (Policy I1)

The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
### Comment ID: PSLPP16/1187  Respondent: 15198337 / Jack Tallick  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

### Comment ID: PSLPP16/1184  Respondent: 15198337 / Jack Tallick  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. I object to poor air quality concerns (Policy I3)

The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

### Comment ID: PSLPP16/1179  Respondent: 15198337 / Jack Tallick  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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Page 2839 of 2855
I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the Local Plan as the development proposed is **not sustainable** (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick’s Arch.

The development should be in urban areas where there is sustainable transport.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/1182</th>
<th>Respondent: 15198337 / Jack Tallick</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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1. I object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPA16/403</th>
<th>Respondent: 15198401 / Tony Porter</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
• I OBJECT TO the lack of any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1190  Respondent: 15198401 / Tony Porter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I OBJECT TO the lack of immediate provision for new schools.
• I OBJECT TO the lack of any immediate provision for Doctors Surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1188  Respondent: 15198401 / Tony Porter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I OBJECT TO all erosion of the Green Belt
• I OBJECT TO any “in-setting” (I.e removal ) of any villages from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1189  Respondent: 15198401 / Tony Porter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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<th>Respondent: 15198529 / Bernice Leach</th>
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<tr>
<td>We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:</td>
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<td>- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty</td>
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<td>- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt increase tail backs on the A31 and traffic congestion</td>
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<td>- result in rat-running through local roads</td>
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<td>- add to Guildford's pollution.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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</table>
5) The wholesale development of 2,000 homes at Gosden Hill Farm, Merrow - Policy A25) in clear contravention of the central government's stated commitment for Green Belt protection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/730  Respondent: 15198913 / Diana Gordon  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3) The Garlick's Arch (Policy A43) proposal to build 400 houses and 7,000 sq. metres of light/ general industrial/ storage distribution space on the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/731  Respondent: 15198913 / Diana Gordon  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4) The creation of new north and southbound slip roads to and from the A3 to the A247 Clandon Road (Policy A43A) at Burnt Common.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/733  Respondent: 15198913 / Diana Gordon  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

7) Policy A44. 1.9. ha land west of Winds Ridge and Send Hill designated for 4- homes and 2 travellers pitches. This has not been consulted upon. The subsoil contains documented unsafe landfill waste and the site is inappropriate due to the narrow country road, with insufficient access to the site.

I strongly OBJECT to all of these plans and feel it goes completely against honouring your repeated election promises to protect the green belt!

I would like all my comments to be seen by the inspector.

Please do the right thing and save Send and Ripley's hugely important Green Belt. I feel it is important to honour promises made and that this development Plan will cause a loss of trust by all residents. It will disrupt the idealistic village environment currently enjoyed and destroy the desirability to live in such an incredible area.

Do not destroy the identity of our village.

Act in the interests of the current residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1480  Respondent: 15198913 / Diana Gordon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2) The enclosure of protected Green Belt land within the proposed new village boundaries (for there will be a presumption for development in the future).

6) Send should not be removed from the Green Belt as it is a buffer between Woking and Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1479  Respondent: 15198913 / Diana Gordon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to express my objections to the Local Plan that threatens to destroy the identity of our villages, zone vast areas of Green Belt land for development and make all the roads in the area permanently congested.

I wish to register my OBJECTIONS to:

1) The number of homes (693p.a.) that the Plan intends to deliver.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/527  Respondent: 15199009 / Alan Toomey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The sheer amount of houses to be build frankly leaves me surprised and depressed. Hard to believe that councilors that we voted for would betray us in such a manner. Why do we need so many. Do you not consider that our way of life will be ruined. Whilst change is normal, change in such a heavy and large development will ruin the Guildford area forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/286  Respondent: 15199009 / Alan Toomey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Build on green belt cannot be legal or right.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: SQLP16/287</th>
<th>Respondent: 15199009 / Alan Toomey</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): (Yes)</td>
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</table>

With so many houses and developments planned - it will no longer be a village.
The amount of houses is too large for a small village.
Traffic will be a major issue - its already bad.
Doctors and dentists and other services will not cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/288</th>
<th>Respondent: 15199009 / Alan Toomey</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</table>

The plan seeks to over whelm any local resident who tries to comment on it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp173/98</th>
<th>Respondent: 15199009 / Alan Toomey</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
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<tr>
<th>Comment ID: pslp172/1143</th>
<th>Respondent: 15199009 / Alan Toomey</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I object to policy 2 at paragraph 4.3.15 to inset Send business park from green belt because its inappropriate development in an area with very poor access, the most narrow and restrictive road in the area and it you see the impact a single box van causes from either direction never mind a juggernaut then you will realise the futility of this application, its an area of outstanding natural beauty, and is also an old non conforming user in an area it should never have been developed in.

Finally, I cannot believe I voted for you. Your lack of support for locals makes your positions on the local council untenable. Please resign your position, as come the next election I will be voting for any one but you guys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: pslp172/1146</th>
<th>Respondent: 15199009 / Alan Toomey</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
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</table>

I object to policy A42 Clockbarn nursery tannery lane because the increase to 60 homes as even 45 homes would bring far too much traffic to a road that is nearly impossible to exit on to the main road. Assuming 2 cars per home, this would bring 120 cars which would bring grid lock to central Send.

This increase completely ignores all previous objections.

The locality is already subject to local flooding - which will be made worse, which the developers will get away with, the local council will ignore and the local residents have to put up with yet again.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to policy A43 Garlicks Arch Send Marsh because this increase completely ignores all previous objections, the traffic is already terrible up to the shell roundabout at to the junction opposite garlicks arch at send march road, it will gridlock traffic all through send and back to old woking. [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]. Green belt should always be protected, this is a travesty that our children and grandchildren will blame you all for, Ripley and send will no longer be villages but a town we might as well rename as RIPSENDOFFLY which if approver is what you have done, who would want to buy a home on land with polluted land (lead shot) lets see you and the developer cover that one up to purchasers, ancient wood land and frequent flooding which will be made much worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to policy A58 Burnt Common because you have included the wording 'minimum' guess you hoped we would not notice, the extra local traffic would make exiting the A3 unsafe and not somewhere your would want to base a business, there is actually no demand for new industrial land as plenty is available at Slyfields which has better access. Again this is in the middle of greenbelt, you are ignoring thousands of previous objections from 2014.</td>
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<th>Comment ID:</th>
<th>PSLPS16/528</th>
<th>Respondent: 15199329 / D P Learmouth</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A26</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt increase tail backs on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1458  Respondent: 15199329 / D P Learmouth  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/531  Respondent: 15199521 / John Rosers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
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- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4786  Respondent: 15199521 / John Rosers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/532  Respondent: 15199617 / Andrew & Carol Herzig  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
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- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3849  Respondent: 15199617 / Andrew & Carol Herzig  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a lifelong bird enthusiast and nature lover, member of the RSPB and member of the Guildford Group of the RSPB since 2001, the aspects of moving to Guildford that have brought me the most pleasure are the proximity to areas of natural beauty and the abundance of wildlife.

On regular walks across the fields around Blackwell Farm earmarked for development in Site A26 we have watched large flocks of migrating redwing and fieldfare, heard owls, cuckoos, and skylarks in abundance, and often glimpsed linnets, yellowhammers and families of deer, disappearing in and out of the cornfield. In summer, the incessant skylark song accompanied by glimpses of deer amongst the golden corn and rape fields is truly spectacular -- and at times we have also been amazed at the abundance of butterflies.

As skylarks and yellowhammers are both on the endangered (red list) species, and places for them to breed safely are becoming increasingly rare, to rob the wildlife of yet another zone of perfect habitat, as well as outstanding natural beauty, seems at the very least short-sighted and lacking in environmental wisdom. The proposed use would have a devastating impact on the Area of Outstanding Natural Beauty (AONB) from an aesthetic and environmental perspective. There are a number of endangered (red list) species which inhabit the Hogs Back including skylarks, little owls, yellow hammers and curlews.

Having recently (2012) conducted a survey for the BTO to assess the current population of nightingales breeding in the area around Broadstreet/Backside Common and bordering the proposed development site, it was immensely disappointing to find that where for many years they had been sighted and heard, nightingales were not in evidence that summer. To remove a further section of the vital wildlife corridor linking Whitmoor Common SPA, SSSI, Chitty’s Common, Rydes Hill Common, Littlefield Common (SNCI), Broad Street and Backside commons (SNCI) to the Hogs Back AONB, would only exacerbate the increasing problem of urbanisation destroying habitats vital to retaining the diversity of species in our area.

It was encouraging however on a late evening walk last night (17 July 2016) to hear spectacularly beautiful and haunting song from a song thrush, in a thicket immediately adjoining the development site. We have recorded it, should it be of interest to the panel. Will these increasingly uncommon birds still be wishing to inhabit an area taken over by building contractors, diggers and machinery? Once lost from our area, will they then return when so much of their habitat has been destroyed?
I cannot emphasise strongly enough my opposition to this development on environmental and aesthetic grounds. The Hogs Back AONB has taken millenia to be formed, vegetated and inhabited by the current wildlife population. Would this current Borough Council wish to be remembered for destroying a section of this beautiful area and the wide-reaching views that have been so precious to countless generations of Guildfordians and those travelling through our county?

Please will you once again reconsider this development – it cannot be in the best interest of our town and its future inhabitants.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/533  Respondent: 15199649 / M A Snell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
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- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/268  Respondent: 15199649 / M A Snell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
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- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/535  Respondent: 15199713 / Michael Osborne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/536  Respondent: 15199777 / Elizabeth Muston  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A21

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Having looked at the parts of the current draft of the local plan mentioned above, I am writing to support the stated aim of sustainability, and also to support any attempt to maintain diversity of environment within the borough.

1. I see the proposed plan includes the development of much of the riverside through Guildford, a good thing I am sure. However, it must be remembered that biodiversity usually works when rough and/or wild areas are kept, and it may become too organised for much flora and fauna to flourish. The Aldershot Road allotments are quite rough, especially at the top, but also there are many plots which are very diverse, worked as organically as possible, and therefore they need to be protected as in the proposed plan, which is all good. But you do need to address the question of how to promote biodiversity amongst all the proposed new building etc. in places like Woodbridge Meadows. I went past the local cemetery today and although it currently looks as if it needs a bit of tidying up, in fact it is probably a really good thing for the biological infrastructure. Plus, the edges were looking really good, a strip of un-tailored meadow planting by the look of it – excellent. So, actively protect the allotment fields please.

2. May I also point out however, that as an allotment virgin (first season!) we have had to bring a lot of stuff to the allotment to start to get it working. The ground is solid heavy clay and we have added lots and lots of bagged compost just to start it moving after a few years of lying fallow, unworked and largely waterlogged. It is still a major task. We have had to bring in nets and posts against pigeons, roof etc to repair the little old shed, an old plastic water butt from our tiny garden at home, and in the autumn we are looking to ship manure and grit to further help break up the soil. In years to come perhaps the compost we will make on site might be enough and it will look after itself more. This is by way of illustration of the fact that for all this we need the car, and if we are not going to clutter up the surrounding streets we need more than a mere six spaces for parking just outside the bottom of the field. Therefore any development of the brown field site between the allotment field and St Joseph’s Primary School needs to preserve and increase the spaces available for allotmenteers. Lack of parking will kill off the allotments in the end so this needs addressing if the council is to fulfil its statutory duties vis a vis allotments.

3. Please include the word ‘allotments’ in the definition of green infrastructure in Policy I4. para 4.6.31, else they will get ignored and eventually ridden roughshod over. If anything we need more of them not fewer. They are beneficial for getting people out of doors, caring for a patch of land to make it productive, and generally beginning to connect with what nature we have left round here. They learn new skills and make new friends. It is already known that a bit of exercise promotes not just physical health but also mental and emotional health, doctors are even prescribing exercise for this purpose. The production of food which is good for one is a great antidote to buying processed food with too much sugar, salt and fat in it. It indirectly promotes cooking as a skill which most of us need to learn or re-learn. Think how many boxes it ticks!

4. Plus the Aldershot Road allotments has school allotments on it for educational purposes, and I understand is a historic site, having had allotments on it since before WW1.

I am glad to be able to have a patch there.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Total records: 4480.